

**WASHINGTON STATE DEPARTMENT OF ECOLOGY
EASTERN REGIONAL OFFICE
4601 NORTH MONROE
SPOKANE, WASHINGTON 99205-1295**

IN THE MATTER OF THE COMPLIANCE BY
BOISE BUILDING SOLUTIONS
KETTLE FALLS PLYWOOD FACILITY

Located in Kettle Falls, Washington,
with Section 70.94.161 RCW, Operating Permits for
Air Contaminant Sources, and the applicable rules and
regulations of the Department of Ecology

AIR OPERATING PERMIT
NO.08AQ-E252
DRAFT PERMIT

To: Boise Building Solutions
1274 South Boise Rd.
Kettle Falls, Washington 99141

Issue Date: July 27, 2009
Effective Date:
Expiration Date:

Responsible Official: Mr. Tom Insko

Legal Authority: This Air Operating Permit is issued under the authority and provisions of the Federal Clean Air Act (FCAA), (42 U.S.C. 7401, et seq.), the Washington Clean Air Act, Chapter 70.94 Revised Code of Washington (RCW) and the Operating Permit Regulation, Chapter 173-401 Washington Administrative Code (WAC).

Hereinafter, Boise Building Solutions is called the permittee. The permittee is required to comply with the provisions contained within this permit.

This DRAFT Air Operating Permit, DATED at Spokane, Washington, this 27th day of July, 2009.

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LIST OF ACRONYMS & ABBREVIATIONS

AOP	Air Operating Permit
BACT	Best Available Control Technology
BTU	British Thermal Units
°C	Degrees Celsius
CAM	Compliance Assurance Monitoring
CEMS	Continuous emission monitoring system
CFR	Code of Federal Regulations
CMS	Continuous Monitoring System
CPMS	Continuous Parameter Monitoring System
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
dscf	Dry Standard Cubic Foot
dscf/m	Dry Standard Cubic Foot per minute
Ecology	Washington State Department of Ecology
E.I.T.	Engineer in Training
EPA	United States Environmental Protection Agency
°F	Degrees Fahrenheit
FCAA	Federal Clean Air Act
FDCP	Fugitive Dust Control Plan
ft ³	Cubic foot
gr/dscf	Grain per dry standard cubic foot
hr	Hour
MMBtu	Million British Thermal Units
MRRR	Monitoring, Recordkeeping, and Reporting Requirement
MVAC	Motor Vehicle Air Conditioner
N ₂	Nitrogen gas
NOC	Notice of Construction
NO _x	Oxides of Nitrogen
NSPS	New Source Performance Standard
O ₂	Oxygen
O&M	Operation & Maintenance
P.E.	Professional Engineer
PM	Particulate Matter
PM-10	Particulate Matter with aerodynamic diameter ≤ 10 micrometers
ppm	Parts per million
QIP	Quality Improvement Plan
PSD	Prevention of Significant Deterioration

RACT	Reasonably Available Control Technology
RCW	Revised Code of Washington
RM	EPA Reference Method from 40 CFR Part 60, Appendix A
RTCO	Regenerative Thermal/Catalytic Oxidizer
SERP	Source Emission Reduction Plan
scfm	Standard Cubic Feet per Minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
SSMP	Startup, Shutdown and Malfunction Plan
TAP	Toxic Air Pollutant
TPY	Tons Per Year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound
WAC	Washington Administrative Code
yr	Year

All submittals required by this permit shall be submitted to the Department of Ecology, the Environmental Protection Agency (EPA), or both as specified by the applicable requirement, at the following addresses.

Air Quality Program	U.S. EPA Region 10 Administrator
Washington Department of Ecology	Air Permits, MS OAQ-108
4601 North Monroe	1200 Sixth Avenue
Spokane, WA 99205-1295	Seattle, WA 98101

STANDARD CONDITIONS

1. PERMIT PROVISOS

1.1. Permit Shield

- 1.1.1. Compliance with the terms and conditions of this permit shall be deemed compliance with those applicable requirements that are specifically included and identified in this permit as of the date of permit issuance.
- 1.1.2. The permit shield shall not apply to any insignificant emissions unit or activity designated under WAC 173-401-530. [WAC 173-401-530(3), 09/16/02], [WAC 173-401-640(1), 09/16/02]

1.2. **Property Rights:** This permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d), 11/04/93].

1.3. **Severability:** If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable. [WAC 173-401-620(2)(h), 11/04/93], [RCW 70.94.905, 1/01/93 (S)] [Order No. 09AQ-E283, Issued 2/02/2009, Approval Condition 4.7], [Order No. 07AQ-E243, 1st Amendment, Issued XX,XX,XXXX, Approval Condition 7.3].

1.4. **Enforceability:** All terms and conditions of the permit are enforceable by the EPA and citizens unless specifically designated as state-only enforceable. [WAC 173-401-625, 09/16/02]

1.5. **General Obligation:** Nothing in this permit shall alter or affect the following:

- 1.5.1. Provisions of section 303 of the FCAA (emergency orders), including the authority of EPA under that section.
- 1.5.2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance.
- 1.5.3. The applicable requirements of the acid rain program, consistent with section 408(a) of the FCAA.
- 1.5.4. The ability of EPA to obtain information from a source pursuant to section 114 of the FCAA.
- 1.5.5. The ability of Ecology to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in chapter 252, Laws of 1993. [WAC 173-401-640(4), 09/16/02]

1.6. **Permit Actions:** This operating permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [WAC 173-401-620(2)(c), 09/16/02]

1.7. **Permit continuation** This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete renewal application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete renewal application has been submitted.
[WAC 173-401-620(2)(j), 9/16/02]

- 1.8. **Permit Appeals** This permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board, P.O. Box 40903, Olympia, WA 98504-0903 and serving it on the Department of Ecology, Appeals Coordinator, P.O. Box 47608, Olympia, WA 98504-7608. Send a copy of the appeal to the Department of Ecology, Air Quality Program, 4601 North Monroe, Spokane, WA 99205-1295 within thirty days of receipt of this permit, pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA. [WAC 173-401-620(2)(i), 11/04/93]
- 1.9. **Need to Halt or Reduce Activity not a Defense** It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [WAC 173-401-620(2)(b), 09/16/02]
- 1.10. **Reasonably Available Control Technology** Emission standards and other requirements contained in rules or regulatory orders in effect at the time of operating permit issuance or renewal shall be considered RACT for purpose of permit issuance or renewal. This does not preclude RACT determinations under Section 8, Chapter 252, Laws of 1993, which shall be incorporated into an operating permit as provided in WAC 173-401-730. [WAC 173-401-605(3)(l), 9/16/02; RCW 70.94.154, 2005 (S)]

2. PERMIT ADMINISTRATION

- 2.1. **Duty to Comply** The permittee must comply with all conditions of this chapter 173-401 operating permit. Any permit noncompliance constitutes a violation of chapter 70.94 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.

[WAC 173-401-620(2)(a), 09/16/02], [Order No. DE 94AQ-E114 2nd Amendment, Issued 2/02/2009, Approval Condition 5.7], [Order No. DE 94AQ-E111, 2nd Amendment, Issued 2/02/2009, Approval Condition 8.8], [Order No. DE 99AQ-E103, Issued 01/19/99, Approval Conditions 9.7, 9.8], [Order No. 09AQ-E283, Issued 2/02/2009, Approval Conditions 4.4, 4.5, 4.6], [PSD-X80-01 First Amendment, Issued 02/14/03, Approval Condition 5], [Order No. DE 91AQ-E123, 1st Amendment, Issued 2/2/2009, Approval Condition 10], [Order No. 07AQ-E243, 1st Amendment, Issued XX,XX,XXXX, Approval Conditions 7.1 & 7.2].
- 2.2. **Compliance Schedules.** The permittee shall continue to comply with applicable requirements with which it is currently in compliance. The permittee shall meet applicable requirements on a timely basis that become effective during the permit term. [WAC 173-401-510(2)(h)(iii)(A),(B) 09/16/02].
- 2.3. **Permit Renewal and Expiration.** This permit is issued for a fixed term of 5 years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application (as outlined in WAC 173-401-510) is submitted at least 12 months, but no greater than 18 months prior to the date of permit expiration. A complete renewal application is due no later than XX XX, XXXX. Upon receipt of a timely and complete application for renewal, this source may continue to operate until Ecology takes final action on the permit application. This protection shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit by the deadline specified in writing by

Ecology, any additional information identified as being needed to process the application. The application shall be sent to Ecology at the address included in this permit. [WAC 173-401-610, 11/04/93; 173-401-705, 11/04/93; 173-401-710, 11/04/93]

- 2.4. **Duty to Provide Information** The permittee shall furnish to Ecology, within a reasonable time, any information that Ecology may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to Ecology copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to Ecology along with a claim of confidentiality. Ecology shall maintain confidentiality of such information in accordance with RCW 70.94.205. No person shall make any false material statement, representation or certification in any form, notice or required report. No person shall render inaccurate any required monitoring device or method. [WAC 173-401-620(2)(e), 09/16/02], [WAC 173-400-105(7), (8), 8/20/93, 9/6/07(S)]
- 2.5. **Duty to Supplement or Correct Application** The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit. [WAC 173-401-500(6), 09/16/02]
- 2.6. **Permit Fees** The permittee shall pay fees as a condition of this permit in accordance with Ecology's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in chapter 70.94 RCW. Ecology may revoke this operating permit if the permit fees are not paid, per WAC 173-401-930(3). [WAC 173-401-620(2)(f), 930(3), 11/04/93], [WAC 173-401-930(3), 01/30/94] [Order No. DE99AQ-E103, Issued 01/19/99, Approval condition 9.9], [Order No. 07AQE- 243, 1st Amendment, Issued XX/XX/2009, Approval Condition 7.6].
- 2.7. **Inspection and Entry** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow Ecology, EPA, or an authorized representative to perform the following:
 - 2.7.1. Enter upon the permittee's premises where a chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - 2.7.2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
 - 2.7.3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - 2.7.4. As authorized by WAC 173-400-105 and the FCCA, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.
 - 2.7.4.1. Ecology may require the permittee to conduct stack testing and/or ambient air monitoring and report the results to Ecology.

2.7.4.2. Ecology may conduct or require that a test be conducted using approved methods from 40 CFR parts 51, 60, 61 and 63 (in effect on February 20, 2001), or the *Ecology Source Test Manual September 20, 2004*. The permittee shall be required to provide platform and sampling ports. Ecology shall be allowed to obtain a sample from any emissions unit. The permittee shall be given the opportunity to observe the sampling and to obtain a sample at the same time.

2.7.5. No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties.

2.7.6. Nothing in this condition shall limit the ability of Ecology or the EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the FCAA.

WAC 173-401-630(2), 11/04/93], [WAC 173-400-105(2),(3), (4), 06/08/07(S)], [RCW 70.94.200, 09/30/87 (S)], [Order No. DE 94AQ-E114 2nd Amendment, Issued 2/02/2009, Approval Condition 4.1, 5.4], [Order No. DE 94AQ-E111 2nd Amendment, Issued 2/02/2009, Approval Conditions 7.1, 7.2, 7.3, 8.5], [Order No. DE 99AQ-E103, Issued 01/19/99, Approval Condition 9.3], [Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 4.1], , [PSD-X80-01 First Amendment, Issued 02/14/03, Approval Condition 6b], [Order No. 07AQE- 243, 1st Amendment, Issued XX/XX/2009, Approval Conditions 2.3 & 7.4].

2.8. Operational Flexibility

The RTCO may be operated in thermal mode (without catalyst) or in catalytic mode. The applicable requirements in conditions 5.6.7, 5.9.1.2 and 5.9.1.3 apply when the RTCO is operating thermally. The applicable requirements in conditions 5.6.6, 5.9.1.4 and 5.9.1.5 apply when the RTCO is operating catalytically.

The permittee shall, contemporaneously with making a change from one operating mode to another, to record in a log a record of the scenario under which it is operating;
[WAC 173-401-650, 09/16/02]

2.9. Record Keeping*

2.9.1. The permittee shall keep records of required monitoring information and support data for a period of five years from the date of collection. Records shall include, where applicable, the following:

2.9.1.1. The date, place, and time of the sampling or measurements.

2.9.1.2. The date(s) analyses were performed.

2.9.1.3. The company or entity that performed the analysis.

2.9.1.4. The analytical techniques or methods used.

2.9.1.5. The results of such analyses.

2.9.1.6. The operating conditions as existing at the time of sampling or measurement.

[WAC 173-401-615(2)(a), (c), 09/16/02]

2.10. Reporting

2.10.1. **Deviation Reports**¹ The permittee shall report deviations from permit conditions, including those attributable to upset conditions as defined in this permit, and include the following information: the time the deviation occurred, the duration of the deviation, the magnitude of the deviation in relation to the applicable limit, the probable cause of the deviation, and any corrective actions or preventive measures taken. Such deviations shall be reported to Ecology at the address included in this permit.

2.10.1.1. Deviations which represent a potential threat to human health or safety must be reported as soon as possible, but in no case later than twelve (12) hours after the deviation is discovered.

2.10.1.2. Excess emissions due to emergency (§2.11.1), or which the source believes unavoidable (§2.11.2) shall be reported within 2 working days of the event.

2.10.1.3. Other deviations shall be reported no later than thirty days after the end of the month in which the deviation is discovered.

Upon request by Ecology, the permittee shall submit a full written report including further details regarding the known causes, the corrective actions taken, and the preventative measures to be taken to minimize or eliminate the chance of recurrence. The source shall maintain a contemporaneous record of all deviations.

Responsible official certification of all monthly deviation reports submitted during the previous six month period shall be included in each semi-annual monitoring report.

[WAC 173-401-615(3)(b), 09/16/02], [WAC 173-400-107, 8/20/93, 9/6/07 (S)], [40 CFR 60.49b(h), 6/13/07], [WAC 173-401-630(1), 09/16/02], [Order No. DE 99AQ-E103, Issued 01/19/99, Approval Condition 7.1], [PSD-X80-01 First Amendment, Issued 02/14/03, Approval Condition 3], [Order No. DE 91AQ-E123, 1st Amendment, Issued 2/2/2009, Approval Conditions 6, 8], [Order No. DE 94AQ-E111 2nd Amendment, Issued 2/02/2009 Approval Condition 3], [Order No. 07AQ-E243, 1st amendment, Issued XX/XX/2009, Approval Conditions 6.1, 6.2].

2.10.2. **Semi-Annual Monitoring Reports:** The permittee shall submit reports of any required monitoring (i.e., Monitoring Recordkeeping and Reporting identified in section 6) at least once every 6 months. Monitoring periods shall be January 1st — June 30th, and July 1st —December 31st. Semi-annual monitoring reports shall be due no later than 30 days following the end of each 6 month period. All instances of deviations from permit requirements must be clearly identified in such reports. Failure to conduct any required monitoring must be reported as a deviation. The report must include identification of all months during which no deviations occurred. All required reports must be certified by a responsible official consistent with Condition 2.10.5. [WAC 173-401-615(3)(a), 09/16/02]

2.10.3. **Compliance Certifications:** The permittee shall submit a certification of compliance with permit terms and conditions at least once per calendar year. All certifications shall be

¹ See Attachment 1 of the SOB for definition of “deviation”.

submitted no later than forty-five (45) days following the end of the certification period. Upon issuance of this final permit, a final compliance certification shall be submitted under the original AOP for the period of time between the latest certification submitted and the renewal permit effective date. The first certification submitted under this renewal AOP shall cover the period of time between the renewal permit effective date and the end of that calendar year. Ecology may require that compliance certifications be submitted more frequently for those emission units not in compliance with permit terms and conditions, or where more frequent certification is specified in the applicable requirement. [WAC 173-401-630(5)(a), 09/16/02], [WAC 173-401-630(1), 09/16/02]

2.10.3.1. The certification shall describe and include the following:

2.10.3.1.1. The permit term or condition that is the basis of the certification,

2.10.3.1.2. The current compliance status,

2.10.3.1.3. Whether compliance was continuous or intermittent, and

2.10.3.1.4. The methods used for determining compliance, currently and over the reporting period consistent with WAC 173-401-615(3)(a).

2.10.3.1.5. All compliance certifications shall be submitted to Ecology and EPA Region 10 at the addresses included in this permit.

[WAC 173-401-630(5)(d), 09/16/02]

2.10.3.2. Where the permit does not require testing, monitoring, recordkeeping and reporting for insignificant emissions units or activities, the permittee may certify continuous compliance if there were no observed, documented, or known instances of noncompliance during the reporting period. [WAC 173-401-530(2)(d), 09/16/02]

2.10.3.3. All compliance certifications shall include certification by a responsible official in accordance with Condition 2.10.5.

2.10.3.4. For the purpose of submitting compliance certifications, or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test had been performed.

[40 CFR 52.33(a)]

2.10.4. **Emission Inventory** The permittee shall submit an inventory of actual emissions from the source for each calendar year. The inventory shall include stack and fugitive emissions of TSP, PM₁₀, PM_{2.5}, SO_x, CO, NO_x, VOC, ammonia, lead and total TAPs, and shall be submitted no later than one hundred five days after the end of the calendar year.

Emissions shall be quantified by multiplying the appropriate operating parameter by an emission factor derived from the most recent source testing. If test-derived factors are unavailable, use the most recent emission factor published by USEPA. Alternative emission factors or emission estimation methods may be used if approved by Ecology. Emission factors and operating parameters shall be clearly identified.).

The inventory for the 2011 calendar year shall include the information required in Table 2a of Appendix A to Subpart A, 40 CFR 51 (12/17/2008).²

The source shall maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. Emissions inventories shall be sent to Ecology at the address included in this permit. [WAC 173-400-105(1), 8/20/93, 9/6/07 (S)], []

- 2.10.5. **Submittals** Reports, test data, monitoring data, notifications, certifications, and applications (including requests for renewal) shall be submitted to Ecology at the address included in this permit. Any document submitted to Ecology pursuant to this permit shall contain certification of truth, accuracy, and completeness by a responsible official. All certifications shall state that *“based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete”*. The permittee shall promptly, upon discovery, report to Ecology any material error or omission in these records, reports, plans or other documents.

[WAC 173-401-520, 09/16/02], [WAC 173-401-500(6), 09/16/02], [40 CFR 60.4(a), (b), 07/01/02]

2.11. **Excess emissions**

- 2.11.1. **Excess emissions due to emergency:** An emergency³, as defined in WAC 173-401-645(1), constitutes an affirmative defense to an action brought for non-compliance with a technology-based⁴ emission limitation if the permittee demonstrates through properly signed, contemporaneous operating logs or other relevant evidence that:

- 2.11.1.1. An emergency occurred and that the permittee can identify the cause(s) of the emergency
- 2.11.1.2. The permitted facility was at the time being properly operated;
- 2.11.1.3. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit;
- 2.11.1.4. The permittee submitted notice of the emergency to Ecology within **two (2) working days** of the time when emission limitations were exceeded due to the emergency, or shorter periods of time specified in an applicable requirement. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 2.11.1.5. In any enforcement action, the permittee seeking to establish the occurrence of an emergency has the burden of proof. [WAC 173-401-645, 9/16/02]

² Attachment 2

³ An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, which requires immediate corrective action to restore normal operation. An emergency does not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

⁴ Technology-based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes.

2.11.2. Unavoidable Excess Emissions: Excess emissions determined to be unavoidable under the procedures and criteria in WAC 173-400-107 shall be excused and not subject to penalty.

- 2.11.2.1. The permittee shall have the burden of proving to Ecology that excess emissions were unavoidable. This demonstration shall be a condition to obtaining relief under 2.11.2.2, 2.11.2.3 or 2.11.2.4.
- 2.11.2.2. Excess emissions due to startup or shutdown conditions shall be considered unavoidable provided the source reports as required under Condition 2.10.1 and adequately demonstrates that the excess emissions could not have been prevented through careful planning and design and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage.
- 2.11.2.3. Excess emissions due to scheduled maintenance shall be considered unavoidable if the source reports as required under Condition 2.10.1 and adequately demonstrates that the excess emissions could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.
- 2.11.2.4. Excess emissions due to upsets shall be considered unavoidable provided the source reports as required under Condition 2.10.1 and adequately demonstrates that:
 - 2.11.2.4.1. The event was not caused by poor or inadequate design, operation, or maintenance and
 - 2.11.2.4.2. The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded. [WAC 173-400-107(3), 8/20/93, 9/6/07 (S)], [WAC 173-400-107, 8/20/93, 9/6/07 (S)]

2.12. Federal Chlorofluorocarbon (CFC) Requirements – Title VI of the FCAA.

- 2.12.1. The permittee shall comply with the following standards for recycling and emissions reductions pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in subpart B.
 - 2.12.1.1. Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.
 - 2.12.1.2. Equipment used during the maintenance, service, repair or disposal must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
 - 2.12.1.3. Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

- 2.12.1.4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. (“MVAC-like appliance” is defined at 40 CFR 82.152.)
- 2.12.1.5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
- 2.12.1.6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep servicing records documenting the date and type of service, as well as the quantity of refrigerant added. The owner/operator must keep records of refrigerant purchased and added to such appliances in cases where owners add their own refrigerant. Such records should indicate the date(s) when refrigerant is added pursuant to 40 CFR 82.166.
- 2.12.1.7. Persons conducting maintenance, service, repair, or disposal of appliances must follow the prohibitions pursuant to 40 CFR 82.154.
- 2.12.1.8. Person performing maintenance, service, repair, or disposal of appliances must certify to the Administrator that such person has acquired certified recovery of recycling equipment pursuant to 40 CFR 82.162.
- 2.12.2. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR 82, Subpart A – Production and Consumption Controls.
- 2.12.3. If the permittee performs a service on motor (fleet) vehicles and when this service involves ozone depleting substance refrigerant in the MVAC, the permittee is subject to all applicable requirements as specified in 40 CFR 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 2.12.4. The permittee shall be allowed to switch from any ozone depleting substance to any alternative that is listed in the Significant New Alternative Program promulgated pursuant to 40 CFR 82, Subpart G – Significant New Alternative Policy Program.[40 CFR 82, 07/01/02], [RCW 70.94.970, 1/4/01 (S)], [RCW 70.94.980, 1/4/01 (S)]
- 2.13. **Insignificant Emission Units**
 - 2.13.1. Upon request from Ecology the permittee must provide documentation sufficient to enable Ecology to determine that the emission unit or activity has been appropriately listed as insignificant.
 - 2.13.2. An activity or emissions unit that qualifies as insignificant solely on the basis of WAC 173-401-530 (1)(a) of shall not exceed the emissions thresholds specified in WAC 173-401-530(4) until the permit is modified pursuant to WAC 173-401-725 (Permit modifications)
 - 2.13.3. Testing, monitoring, recordkeeping and reporting are not required for insignificant emissions units and activities unless determined by the permitting authority to be necessary to assure compliance, or unless it is otherwise required by a generally applicable requirement of the state implementation plan. [WAC 173-401-530(2)(c), 09/16/02]

- 2.13.4. Upon request from the permitting authority, at any time during the term of the permit, an applicant who lists an activity or emissions unit as insignificant under WAC 173-401-530 (1)(a) shall demonstrate to the permitting authority that the actual emissions of the unit or activity are below the emission thresholds. [WAC 173-401-530(2), (4), (5),(6), 09/16/02]

3. PERMIT CHANGES

3.1. Changes not requiring permit revisions

- 3.1.1. *Section 502(b)(10) changes.* The permittee is authorized to make section 502(b)(10) changes, as defined in WAC 173-401-200(30), without a permit revision, providing the conditions included below are met. The permit shield as described in Condition 1.1 shall not apply to any change made pursuant to this paragraph.
- 3.1.1.1. The proposed changes are not Title I (FCAA) modifications;
- 3.1.1.2. The proposed changes do not result in emissions which exceed those allowable under the permit, whether expressed as a rate of emissions, or in total emissions;
- 3.1.1.3. The proposed changes do not alter permit terms that are necessary to enforce limitation on emissions from units covered by the permit;
- 3.1.1.4. The facility provides Ecology and EPA with written notification at least 7 days prior to making the proposed changes except that written notification of a change made in response to an emergency shall be provided as soon as possible after the event;
- The written notification shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- 3.1.2. *Changes related to Emissions trading under an emissions cap.* Pursuant to Condition 3.1.1, the permittee is authorized to trade increases and decreases in emission in the permitted facility, where the Washington state implementation plan provides for such emissions trades without requiring a permit revision. This provision is available in those cases where the permit does not already provide for such emissions trading. Such changes shall be subject to the following:
- 3.1.2.1. The written notification required under Condition 3.1.1.4 shall include such information as may be required by the provision in the Washington SIP authorizing the emissions trade, including at a minimum, when the proposed change will occur, a description of each such change, any change in emissions, the permit requirements with which the source will comply using the emissions trading provisions of the Washington SIP, and the pollutants emitted subject to the emissions trade. The notice shall also refer to the provisions with which the source will comply in the applicable implementation plan and that provide for the emissions trade. The notification shall state how any increases or decreases in emissions will comply with the terms and conditions of the permit. (The permit shield described under Condition 1.1 shall extend to terms and conditions that allow such increases and decreases.)

- 3.1.2.2. The permit shield described in Condition 1.1 shall not extend to any change made under this paragraph. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the applicable implementation plan authorizing the emissions trade.
 - 3.1.2.3. Upon the request of the permit applicant, Ecology shall issue permits that contain terms and conditions, including all terms required under WAC 173-401-600 through 173-401-630 to determine compliance, allowing for the trading of emissions increases and decreases in the chapter 173-401 WAC source solely for the purpose of complying with a federally enforceable emissions cap that is established in the permit independent of otherwise applicable requirements. The permit applicant shall include in its application proposed replicable procedures and permit terms that ensure the emissions trades are quantifiable and enforceable. The emissions trading provision shall not be applied to any emissions units for which emission are not quantifiable or for which there are no replicable procedures to enforce the emissions trades. The permit shall also require compliance with all applicable requirements.
 - 3.1.2.4. A source making a change under this section shall comply with applicable preconstruction review requirements established pursuant to Condition 4.1.
 - 3.1.2.5. No permit revision shall be required, under any approved economic incentives, marketable permits, and other similar programs or processes for changes that are provided for in this permit such as emissions trading. [WAC 173-401-722, 10/17/02], [WAC 173-401-620(2)(g), 09/16/02]
- 3.2. **Off-Permit Changes:** The permittee is allowed to make certain changes that are not specifically addressed or prohibited by this permit without a permit revision. All such changes must meet the following conditions:
- 3.2.1. The proposed changes shall not weaken the enforceability of any existing permit conditions.
 - 3.2.2. Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition.
 - 3.2.3. Before or contemporaneously with making the permit change, the permittee must provide written notice to Ecology and EPA Region 10 at the respective addresses included in this permit. Such written notice shall describe each such change, including the date, any change in emissions or pollutants emitted and any applicable requirements that would apply as a result of the change.
 - 3.2.4. The change shall not qualify for the permit shield under Condition 1.1.
 - 3.2.5. The permittee shall record all changes that result in emissions of any regulated air pollutant subject to any applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes. The record shall reside at the permitted facility.
 - 3.2.6. A source making a change under this section shall comply with the preconstruction review requirements established pursuant to Conditions 4.1 and 4.2. [WAC 173-401-724, 11/04/93]

3.3. Reopening for Cause

- 3.3.1. Ecology will reopen and revise this permit as necessary to remedy deficiencies in the following circumstances:
 - 3.3.1.1. Additional requirements under the FCAA become applicable to a major source three (3) or more years prior to the expiration date of this permit. Such a reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j).
 - 3.3.1.2. Ecology or the Administrator determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
 - 3.3.1.3. Ecology or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- 3.3.2. Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- 3.3.3. Reopening shall not be initiated before a notice of intent to reopen is provided to the permittee by Ecology at least thirty (30) days in advance of the date that this permit is to be reopened, except that Ecology may provide a shorter time period in the case of an emergency.
- 3.3.4. All permit conditions remain in effect until such time as Ecology takes final action.[WAC 173-401-730, 09/16/02]

3.4. Administrative Permit Amendments

- 3.4.1. An administrative permit amendment is a permit revision that:
 - 3.4.1.1. Allows for a change in ownership or operational control of this source where the permitting authority has determined that no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to Ecology,
 - 3.4.1.2. Corrects typographical errors within the permit,
 - 3.4.1.3. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides for a similar minor administrative change at the source,
 - 3.4.1.4. Requires more frequent monitoring or reporting by the permittee, or
 - 3.4.1.5. Incorporates into the permit the terms, conditions, and provisions from orders approving notice of construction applications processed under an EPA-approved program, provide that such a program meets procedural requirements substantially equivalent to the requirements of WAC 173-401-700, 173-401-725, and 173-401-800 that would be applicable to the change if it were subject to review as a permit

modification, and compliance requirements substantially equivalent to those contained in WAC 173-401-600 through 173-401-650.

- 3.4.2. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.
- 3.4.3. Ecology shall take no more than sixty days from receipt of a request for an administrative permit amendment to take final action on such request, and may incorporate such changes without providing notice to the public or affected states provided that it designates any such permit revisions as having been made pursuant to WAC 173-401-720(3)(a)
- 3.4.4. The permitting authority shall, upon taking final action granting a request for an administrative permit amendment, allow coverage by the permit shield in WAC 173-401-640 for administrative permit amendments made pursuant to condition 1.15.1.5 above. [WAC 173-401-720, 09/16/02]

4. APPLICABLE WHEN TRIGGERED REQUIREMENTS

The following requirements apply if the permittee takes certain actions or proposes changes that trigger applicability. No monitoring is specified for these requirements, but the Compliance Certification specified in section 2.10.3 must include a description of the permittee's compliance status.

- 4.1. New Source Review: The permittee shall not construct new sources or make modifications required to be reviewed under WAC 173-400-110, WAC 173-400-113, WAC 173-400-141, or WAC 173-460 before the permittee obtains written final approval from Ecology in accordance with those regulations, pays the appropriate fees required by WAC 173-455-120, and pays the cost of public notice described in WAC 173-400-171.
[WAC 173-400-110, 8/20/93, 9/6/07 (S)], [WAC 173-400-113, 8/20/93, 9/6/07 (S)], [WAC 173-455-120, 9/6/07 (S)], [WAC 173-400-171, 8/20/93, 9/6/07 (S)], [WAC 173-460, 7/21/98 (S)], [RCW 70.94.152, 1/4/01 (S)], [Order No. DE 94AQ-E111 2nd Amendment, Issued 2/02/2009, Approval Condition 1], [Order No. DE 99AQ-E103, Issued 01/19/99, Approval Condition 1], [Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 4.3]
- 4.2. Replacement or Substantial Alteration of Emission Control Technology: Prior to replacing or substantially altering emission control technology subject to review under WAC 173-400-114, the permittee shall file for and obtain approval from Ecology according to that regulation. The permittee shall pay the appropriate fees required by WAC 173-400-045(4) prior to commencing construction. [WAC 173-400-045(4), 9/6/07 (S)], [WAC 173-400-114, 9/6/07 (S)], [RCW 70.94.153, 1/4/01 (S)]
- 4.3. Demolition and Renovation (asbestos): Prior to, during and after conducting any activity to which 40 CFR 61, Subpart M – National Emission Standard for Asbestos, applies, the permittee shall comply with the requirements of that rule. Such activities include notification, demolition, renovation, asbestos stripping or removal, installing or reinstalling insulation, manufacturing of fabricating certain items, spraying of certain materials, constructing roadways of certain materials, or disposal. [40 CFR 61, Subpart M, 07/01/02], [WAC 173-400-075(1), 9/6/07 (S)]

4.4. Source Testing: The following notification and reporting conditions apply to all required source testing

4.4.1. Notification: The permittee shall provide at least 30 days notice prior to any performance test. The notice shall include a source test plan for approval. If Ecology does not provide comments on the plan within three weeks, the plan shall be considered acceptable. If there is a delay in conducting a scheduled performance test, the permittee shall notify Ecology as soon as possible. The notification shall include at least:

4.4.1.1.A test schedule;

4.4.1.2. Proposed test methods, including a request to deviate from any required test method

4.4.1.3. Operating conditions (production rates, equipment operating rates, etc.) during the test. Ecology may require specific operating conditions to be met.

4.4.1.4. Any adjustments that will be made prior to the stack test, such as tuning burners or changing bags in a baghouse. Normally scheduled periodic maintenance need not be included

4.4.2. Source test Methods: Source testing shall be conducted using EPA methods from 40 CFR Parts 51, 60, 61 and 63 (in effect on October 1, 2006) or procedures in *Ecology Source Test Manual September 20, 2004 (available online at http://www.ecy.wa.gov/programs/air/Source_Test/sourcetesthome.html)*. Changes to the test methods specified in the Applicable Requirements must be approved in advance by Ecology. Requests for changes must be submitted in writing at least 30 days prior to the performance test.

4.4.3. Test reports. The permittee shall submit source test reports to Ecology within 60 days of test completion. Test reports shall include:

4.4.3.1. The date and time of the test.

4.4.3.2. A description of the source, associated pollution control equipment and sampling locations.

4.4.3.3. A description of the test methods and quality assurance procedures used.

4.4.3.4. A summary of results in the same units and averaging periods as the applicable emission standard.

4.4.3.5. Field data and sample calculations.

4.4.3.6. Operating data such as the amount of fuel burned, raw materials processed or product produced during the test

4.4.3.7. Source and control equipment operating parameters measured during the test.

4.5. Chemical Accident Prevention Provisions: An owner or operator that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR §68.115, shall comply with the requirements of 40 CFR Part 68 no later than the latest of the following dates:

4.5.1. Three years after the date on which regulated substance present above a threshold quantity is first listed under 40 CFR §68.130, or;

4.5.2. The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 63.10 (d)(2)], [40 CFR Part 68, (1988)], [WAC 173-401-630(1), 9/16/02], [Order No. 07AQE- 243, 1st Amendment, Issued XX/XX/2009, Approval Conditions 2.2, 2.3 & 2.4], [Order No. DE99AQ-E103, Issued 1/19/1999, Approval Condition 2.2].

5. EMISSION LIMITATIONS AND WORK PRACTICE REQUIREMENTS

Pursuant to Washington Administrative Code (WAC) 173-401 the permittee is authorized to operate the Kettle Falls, Washington plywood facility in accordance with the terms and conditions listed in this permit. These processes are subject to the conditions included in Sections 5.1 through 5.7; to the Monitoring, Recordkeeping, and Reporting Requirements in Section 6, and to other terms and conditions specified in this permit⁵.

The column entitled **Description** in each table contains abbreviated and/or paraphrased versions of the applicable conditions, emission limitations or work practices. The cited condition, emission standard or work practice is the enforceable requirement. Any perceived discrepancies between the description and an underlying applicable requirement will be resolved by reference to the cited applicable requirement.

Testing Requirements

Although there are conditions with no on-going testing requirements, Ecology retains the authority to conduct or require that testing be conducted per WAC 173-400-105(4). Identification of the appropriate test method is necessary to make emission limits fully enforceable. Where the underlying applicable requirement does not specify the test method, Ecology has done so in this permit.

[WAC 173-401-615(1)(a), 09/16/02], [WAC 173-401-630(1), 09/16/02], [WAC 173-400-105(4), 8/20/93, 9/6/07(S)]

Streamlining

An asterisk following a condition number indicates that streamlining of a less stringent requirement has taken place and is listed in Table 7.3.

⁵ The monitoring, recordkeeping and reporting requirements in Section 6 do not apply to insignificant emissions units or activities.

5.1 Facility Wide

This section is applicable and enforceable with respect to all emission units source wide, including those emission units in Sections 2.2 through 2.8. Monitoring, recordkeeping and reporting requirements in this section do not apply to insignificant emission units.

TABLE 2.1

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.1.1	WAC 173-400-040(1), (1)(a), and (1)(b) (8/20/93) WAC173-400-040(1), (1)(a),and (1)(b) (07/11/02)	F S	Visible emissions shall not exceed 20% opacity for more than 3 minutes in any one hour	RM9A	2M
5.1.2	WAC 173-400-060 (8/20/93) WAC 173-400-060 (07/11/02)	F S	General process units are required to meet all applicable provisions of WAC 173-400-040 and emissions of particulate material from any operation shall not exceed 0.1 grain/dscf of exhaust gas	RM 5	4M
5.1.3	WAC 173-400-040(2) 07/11/02	S	Particulate matter shall not be deposited beyond the property in sufficient quantity to interfere unreasonably with the use and enjoyment of other's property		1M
5.1.4	WAC 173-400-040(3)(a), (8)(a) (8/20/93) WAC 173-400-040(3)(a), (8)(a), 07/11/02	F S	The permittee shall perform maintenance to minimize emissions and take reasonable precautions to prevent the release of air contaminants.		3M
5.1.5	WAC 173-400-040(3(a), (8)(a) (07/11/02)	S	The permittee shall take reasonable precautions to prevent fugitive dust. Maintain & operate to minimize emissions.		3M

5.1.6	WAC 173-400-040(4), 07/11/02	S	Any producer of an odor which may unreasonably interfere with any other property owner's use and enjoyment of his property must reduce these odors to a reasonable minimum		1M
5.1.7	WAC 173-400-040(5), (8/20/93) WAC 173-400-040(5), (07/11/02)	F S	No person shall cause or permit the emission of any air contaminant if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business		1M
5.1.8	WAC 173-400-040(7), (8/20/93) WAC 173-400-040(7),07/11/02	F S	No person shall conceal or mask an emission of an air contaminant		None
5.1.9	WAC 173-400-200(2), (8/20/93) WAC 173-400-200(2), 07/11/02	F S	No source may use dispersion techniques or excess stack height to meet ambient air quality standards or PSD increment limitations		None
5.1.10	WAC 173-400-205 (8/20/93)	F	Varying the rate of emission of a pollutant according to atmospheric conditions is prohibited, except as directed according to air pollution episode regulations		None
5.1.11	RCW 70.94.040 (1/4/01)	S	Causing air pollution in violation of Chapter 70.94 RCW is unlawful		None
5.1.12	Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 4.8 Order No. DE 94AQ-E114, 2 nd Amendment, Issued 2/02/2009, Approval Condition 5.3 Order No. DE 94AQ-E111	F	No outdoor burning, except as allowed by WAC 173-425.		None

	2 nd Amendment, Issued 2/02/2009, Approval Condition 8.3 Order No. DE 99AQ-E103, Issued 01/19/99, Approval Condition 9.6 WAC 173-425 – Restriction on Open Burning (3/13)00)				
5.1.13	WAC 173-400-040, 1st ¶ (8/20/93)	F	All emissions units are required to use RACT		None
5.1.14	WAC 173-400-04 (6, 1 st ¶), 8/20/93 WAC 173-400-040 (6, 1 st ¶), 07/11/02	F S	No person shall cause or allow the emission of a gas containing sulfur dioxide from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes	RM6	5M

5.2 Cyclone C-2

TABLE 2.2

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.2.1	Order DE 94AQ-E114, 2 nd Amendment, Issued 2/02/2009, Approval Condition 2.1	F	Opacity from the cyclone exhaust shall be less than 10 percent over a six minute interval	RM 9	2M
5.2.2	Order DE 94AQ-E114, 2 nd Amendment, Issued 2/02/2009 Approval Condition 5.1	F	No visible emissions shall be allowed beyond the property line	RM 9 RM 22	4M

5.2.3	Order DE 94AQ-E114, 2 nd Amendment, Issued 2/02/2009, Approval Conditions 3 and 5.2	F	The cyclone catch shall be controlled to prevent it from becoming airborne – it shall be routed through an airlock and then conveyed to the silo servicing the hogged fuel boiler		None
5.2.4	Order DE 94AQ-E114, 2 nd Amendment, Issued 2/02/2009, Approval Condition 5.5	F	Legible copies of the Order shall be on site		None
5.2.5	Order DE 94AQ-E114, 2 nd Amendment, Issued 2/02/2009, Approval Condition 5.6	F	Construct according to the information and specifications submitted as part of the NOC application. Operate in accordance with manufacturer's instructions and the O&M manual		3M

5.3 Baghouse #1

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.3.1	Order DE 94AQ-E111 2 nd Amendment, Issued 2/02/2009, Approval Condition 2.2	F	Opacity from the baghouse exhaust shall be less than 10 percent over a six minute interval	RM9	2M
5.3.2	Order DE 94AQ-E111 1 st Amendment, 2 nd Amendment, Issued 2/02/2009, Approval Condition 8.1	F	No visible emissions shall be allowed beyond the property line	RM 9, RM 22	4M
5.3.3	Order DE 94AQ-E111 2 nd Amendment, Issued 2/02/2009, Approval Condition 2.1	F	PM emissions from the baghouse exhaust shall not exceed 0.01 gr/dscf	RM 5	4M
5.3.4	Order DE 94AQ-E111, 2 nd Amendment, Issued 2/02/2009, Approval Condition 1	F	Total annual plywood production shall not exceed 280,000,000 square feet of 3/8" plywood		8M
5.3.5	Order DE 94AQ-E111 2 nd Amendment, Issued 2/02/2009, Approval Condition 5.	F	Baghouse monitors and access ports required.		3M
5.3.6	Order DE 94AQ-E111 2 nd Amendment, Issued 2/02/2009, Approval Condition 8.2	F	The baghouse catch shall be processed back into the cyclone inlet in a closed system.		3M
5.3.7	Order DE 94AQ-E111 2 nd Amendment, Issued 2/02/2009, Approval	F	An electrical interlock or administrative requirement shall prevent dry waste processing unless the baghouse is online		3M, 7M

	Condition 3				
5.3.8	Order DE 94AQ-E111 2 nd Amendment, Issued 2/02/2009 Approval Conditions 6	F	O&M manual shall be followed and kept updated to reflect any modifications		7M
5.3.9	Order DE 94AQ-E111 2 nd Amendment, Issued 2/02/2009, Approval Condition 8.4	F	Order void if operation is discontinued for eighteen (18) months		None
5.3.10	Order DE 94AQ-E111 2 nd Amendment, Issued 2/02/2009, Approval Condition 8.6	F	Legible copies of Order DE 94AQ-E111 2 nd Amendment and the O&M manual shall be in the working vicinity and available to the employees in direct operation of baghouse #1		None
5.3.11	Order DE 94AQ-E111 2 nd Amendment, Issued 2/02/2009, Approval Condition 8.7	F	All equipment must be operated in accordance with the information contained within the NOC application, O&M manual and manufacturer's instructions unless otherwise approved in writing by Ecology		3M

5.4 Baghouse #2

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.4.1	Order DE 99AQ-E103, Issued 01/19/99, Approval Condition 2.1	F	Opacity from the baghouse exhaust shall not exceed 10 percent, averaged over a 6-minute interval.	RM 9	2M
5.4.2	Order DE 99AQ-E103, Issued 01/19/99, Approval Condition 8.2	F	The baghouse catch shall be routed through a rotary airlock to an enclosed catch system.. There shall be no visible emissions from the baghouse catch system	RM 9	4M
5.4.3	Order DE 99AQ-E103, Issued 01/19/99, Approval Condition 9.1	F	No visible emissions shall be allowed beyond the property line	RM 9 RM 22	4M
5.4.4	Order DE 99AQ-E103, Issued 01/19/99, Approval Condition 2.2	F	PM-10 emissions from the baghouse exhaust shall not exceed 0.01 gr/dscf	RM 5	4M
5.4.5	Order DE 99AQ-E103, Issued 01/19/99, Approval Condition 8.1	F	An electrical interlock, some other fail-safe device or administrative requirement shall prevent operation of the cyclone upstream of baghouse #2 unless the baghouse is online		3M, 7M
5.4.6	Order DE 99AQ-E103, Issued 01/19/99, Approval Conditions 4	F	O&M manual shall be followed and kept updated to reflect any modifications		7M
5.4.7	Order DE 99AQ-E103, Issued 01/19/99, Approval Condition 9.2	F	Order No. DE 99AQ-E103 becomes void if operation is discontinued for eighteen (18) months		None

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.4.8	Order DE 99AQ-E103, Issued 01/19/99, Approval Condition 9.4	F	Legible copies of Order DE 99AQ-E103 and the O&M manual shall be available to the employees in direct operation of baghouse #2		None
5.4.9	Order DE 99AQ-E103, Issued 01/19/99, Approval Condition 9.5	F	All equipment must be operated in accordance with the information contained within the NOC application, O&M manual and manufacturer's instructions unless otherwise approved in writing by Ecology		3M

5.5 Veneer Dryers #2 & 3

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.5.1	Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 1.1	F	No visible emissions shall be allowed beyond the property line	RM 9 RM 22	4M
5.5.2	Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 2.1	F	Total facility production shall not exceed 280 million square feet (3/8" equivalent) plywood per year.		8M
5.5.3	Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 2.3	F	Exceeding production cap may require a notice of construction. Any modification of plant or operating procedures shall be reported to Ecology.		None
5.5.4	Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 2.4	F	No leaks or losses of PM, dryer combustion gases & organic compounds during normal steady state operations.		25M
5.5.5	Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 3,	F	Site specific O&M manuals for all equipment with potential to affect emissions shall be maintained and followed. Manuals shall be updated to reflect modifications of plant or operating procedures.		9M
5.5.6	Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 4.2	F	Legible copies of the approval order and the O&M manual shall be in the working vicinity and available to the employees in direct operation of the dryers and		None

			emission control systems.		
Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.5.7	Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 4.3	F	The facility shall be constructed according to the information and specifications submitted as part of the NOC application. The facility shall be operated in accordance with manufacturer's instructions and the O&M manual, unless otherwise approved in writing by Ecology.		3M

5.6 Fluid Bed Combustor

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.6.1	Order No. 07AQ-E243, 1 st Amendment, Issued XX/XX/2009, Approval Condition 3.6	S	Opacity from the control device stack shall not exceed 10% for more than 6 minutes in any hour.	RM 9	2M
5.6.2*	Order PSD-X80-01, First Amendment, Issued 02/14/03, Approval Condition 1	F	Emissions of particulate matter from the FBC stack shall not exceed 0.04 gr/dscf	RM 5	11M, 12M

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.6.3	Order No. 07AQ-E243, 1 st Amendment, Issued XX/XX/2009, Approval Condition 3.4	S	Emissions of filterable particulate matter from the ESP/RTCO stack \leq 4.0 lb/hr (3-hour average)	RM5	11M, 12M
5.6.4	Order PSD-X80-01, First Amendment, Issued 02/14/03, Approval Condition 1	F	Annual emissions of particulate matter from the FBC/veneer dryer shall not exceed 186 tons	RM 5	11M
5.6.5	Order No. 07AQ-E243, 1 st Amendment, Issued XX/XX/2009, Approval Condition 3.1	S	NOx emissions \leq 123 tons, 12-month rolling average	RM7 or 7A	11M
5.6.6	Order No. 07AQ-E243, 1 st Amendment, Issued XX/XX/2009, Approval Condition 3.2.1	S	In catalytic mode, CO emissions at the RTCO outlet shall not exceed 10% by mass of CO measured at the inlet.	RM10	11M
5.6.7	Order No. 07AQ-E243, 1 st Amendment, Issued XX/XX/2009, Approval Condition 3.2.2	S	In thermal mode, the emission limit shall be based on the first source test run on the RTCO stack. The CO emissions limit will be based on operation of the RTCO at the temperature at which 90% VOC destruction is achieved.	RM10	11M
5.6.8	Order No. 07AQ-E243, 1 st Amendment, Issued XX/XX/2009, Approval Condition 3.3.1.	S	VOC emissions \leq 2.83 lb/hr (3-hour block)	RM25A	11M
5.6.9	Order No. 07AQ-E243, 1 st Amendment, Issued XX/XX/2009, Approval Condition 3.3.2	S	VOC emissions at the RTCO outlet shall not exceed 10% by mass of the VOC emissions at the RTCO inlet.	RM25A	11M

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.6.10	Order No. 07AQ-E243, 1 st Amendment, Issued XX/XX/2009, Approval Condition 3.5	S	SO2 emissions \leq 8,480 lb, 12-month rolling average	RM6	5M, 11M
5.6.11	Order No. 07AQ-E243, 1 st Amendment, Issued XX/XX/2009, Approval Condition 1.2	S	Natural gas shall be the only fuel used by the RTCO.		none
5.6.12	Order No. 07AQ-E243, 1 st Amendment, Issued XX/XX/2009, Approval Condition 1.5	S	RTCO shall not be operated at temperature $>1900^{\circ}\text{F}$ (3-hour average) at any time.		20M, 21M
5.6.13	Order No. 07AQ-E243, 1 st Amendment, Issued XX/XX/2009, Approval Condition 4.1	S	Prepare and update RTCO & ESP O&M Manuals		10M
5.6.14	40 CFR 64.7(b)	F	The permittee shall maintain the monitoring equipment specified in MRRR 11M, including but not limited to, maintaining necessary parts for routine repairs of the equipment		12M
5.6.15	Order PSD-X80-01 First Amendment Issued 02/14/03 Approval Condition 5	F	All equipment must be operated in accordance with the information contained within the PSD application		3M
5.6.16	Order No. 07AQ-E243, 1 st Amendment, Issued XX/XX/2009, Approval Condition 7.5	S	Copy of Order available to employees, and to Ecology upon request.		none

5.7 Hogged Fuel Boiler and Electrified Filter Bed

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.7.1*	Order PSD-X80-01, First Amendment, Issued 02/14/03, Approval Condition 1	F	Opacity from the EFB stack shall not exceed 10% for more than 6 minutes in one hour, as measured by RM 9.	RM 9	2M
	Order No. DE 91AQ-E123, 1 st Amendment, Issued 2/2/2009, Approval Condition 1(b)	S			
5.7.2	Order No. DE 91AQ-E123, 1 st Amendment, Issued 2/2/2009, Approval Condition 1(b)	S	Opacity from the FBB stack shall not exceed 10% on an hourly average as measured by COMS		15M
5.7.3	WAC 173-400-040(1), (1)(a), and (1)(b) (8/20/93)	F	Visible emissions shall not exceed 20% opacity for more than 3 minutes in any one hour.	RM 9A	2M
	WAC 173-400-040(1), (1)(a), and (1)(b) (07/11/02)	S			
5.7.4*	Order No. DE 91AQ-E123, 1 st Amendment, Issued 2/2/2009, Approval Condition 1(a)	S	Emissions of PM-10 shall not exceed 0.030 gr/dscf @ 7% O ₂ and 19 tons/year	RM 5	14M
5.7.5	Order PSD-X80-01, First Amendment, Issued 02/14/03, Approval Condition 1	F	Emissions of particulate matter shall not exceed 0.04 gr/dscf	RM 5	14M
5.7.6	Order PSD-X80-01, First Amendment, Issued	F	Annual emissions of particulate matter shall not exceed 196 tons	RM 5	14M

	02/14/03, Approval Condition 1				
Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.7.7	WAC 173-400-070(2)(b), 8/20/93, WAC 173-400-070(2)(b), 07/11/02	F S	All hogged fuel boilers shall utilize RACT and shall be operated and maintained to minimize emissions		None
5.7.8	Order No. DE 91AQ-E123, 1 st Amendment, Issued 2/2/2009, Approval Condition 5	S	Hogged fuel boiler shall not be operated above the following steaming rates: <ul style="list-style-type: none"> • 40,000 lb/hr between 5/1 and 9/30 • 45,000 lb/hr between 10/1 and 4/30. 		13M
5.7.9	Order No. DE 91AQ-E123, 1 st Amendment, Issued 2/2/2009, Approval Condition 6	S	The hogged fuel boiler abort gate shall be used only in specific emergency situations. The boiler shall not be operated when exhaust gases bypass the FBB		18M
5.7.10	Order No. DE 91AQ-E123, 1 st Amendment, Issued 2/2/2009, Approval Condition 7	S	The continuous oxygen monitoring system shall be operated in accordance with the Q/A Plan		13M, 16M
5.7.11	Order No. DE 91AQ-E123, 1 st Amendment, Issued 2/2/2009, Approval Condition 4	S	O&M manual shall be followed and kept updated to reflect any modifications		16M
5.7.12	40 CFR 64.7(b)	F	The permittee shall maintain the monitoring equipment specified in 15M, 19M and 23M, including but not limited to, maintaining necessary parts for routine repairs of the equipment		12M
5.7.13	Order PSD-X80-01, First Amendment, Issued 02/14/03, Approval Condition 5	F	All equipment must be operated in accordance with the information contained within the PSD application		3M

5.8 PCWP MACT: General Conditions

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR
5.8.1	40 CFR 63.2290	F	40 CFR 63, Subpart DDDD, Table 10 ⁶ shows which parts of the General Provisions in §§63.1 through 63.13 apply to the permittee.		none
5.8.2*	40 CFR 63.2250(a)	F	The permittee must be in compliance with the compliance options, operating requirements, and the work practice requirements in this subpart at all times, except; prior to process unit initial startup; and during the routine control device maintenance exemption specified in §63.2251 ⁷ . The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating.		20M – 26M
5.8.3	40 CFR 63.2250(b)	F	The permittee must always operate and maintain the affected source ⁸ , including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1).		26M
5.8.4*	40 CFR 63.2250(c)	F	The permittee must develop a written SSMP according to the provisions in §63.6(e)(3).		26M

⁶ Attachment 9

⁷ The routine control device maintenance exemption applies only to the thermal oxidizer. See condition 5.9.1.

⁸ The affected source is the collection of dryers, refiners, blenders, formers, presses, board coolers, and other process units associated with the manufacturing of plywood and composite wood products. The affected source includes, but is not limited to, green end operations, refining, drying operations (including any combustion unit exhaust stream routinely used to direct fire process unit(s)), resin preparation, blending and forming operations, pressing and board cooling operations, and miscellaneous finishing operations (such as sanding, sawing, patching, edge sealing, and other finishing operations not subject to other national emission standards for hazardous air pollutants (NESHAP)). The affected source also includes onsite storage and preparation of raw materials used in the manufacture of plywood and/or composite wood products, such as resins; onsite wastewater treatment operations specifically associated with plywood and composite wood products manufacturing; and miscellaneous coating operations (§63.2292). The affected source includes lumber kilns at PCWP manufacturing facilities and at any other kind of facility.

5.9 PCWP MACT Compliance Options, Operating Requirements and Work Practice Requirements:

5.9.1 Softwood veneer dryers.

The following apply to veneer dryers 1, 2 & 3.

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR
5.9.1.1	40 CFR 63, Subpart DDDD, Table 1B, <i>Compliance Options</i> , Softwood veneer dryer heated zones ⁹	F	Use an emission control system to reduce emissions of total HAP, measured as THC (as carbon), by 90 percent; or Limit emissions of total HAP, measured as THC (as carbon) to 20 ppmvd	25A	19M
5.9.1.2*	40 CFR 63, Subpart DDDD, Table 2(1) ¹⁰ , <i>Operating Requirements</i>	F	For thermal oxidizer, maintain the 3-hour block average firebox temperature above the minimum temperature established during the performance test		20M, 21M
5.9.1.3	40 CFR 63.2251 (b), (d), (e)	F	The compliance options and operating requirements do not apply when thermal oxidizer maintenance covered under the routine control device maintenance exemption submitted on 8/7/2008 ¹¹ is performed. The routine control device maintenance exemption must not exceed 0.5 % of annual uptime for the veneer dryers. The permittee must minimize, to the extent practical, startup and shutdown of the thermal oxidizer must be scheduled during times when the veneer dryers are also shut down.		21M, 23M
5.9.1.4*	40 CFR 63, Subpart DDDD, Table 2(2), <i>Operating Requirements</i>	F	For catalytic oxidizer, maintain the 3-hour block average catalytic oxidizer temperature above the minimum temperature established during the performance test		20M
5.9.1.5*	40 CFR 63, Subpart DDDD, Table 2(2),	F	For catalytic oxidizer, check the activity level of a representative sample of the catalyst at least every 12		21M

⁹ Attachment 3

¹⁰ Attachment 3

¹¹ Attachment 1

	<i>Operating Requirements</i>		months, and take any necessary corrective action to ensure that the catalyst is performing within its design range.		
5.9.1.6	40 CFR 63, Subpart DDDD, Table 3 ¹² , <i>Work Practice Requirements</i>	F	Minimize fugitive emissions from the dryer doors (through proper maintenance procedures) and the green end of the dryers (through proper balancing of the heated zone exhausts).	None	25M

5.9.2 Group 1 Miscellaneous Coating Operations

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR
5.9.2.1	40 CFR 63, Subpart DDDD, Table 3, <i>Work Practice Requirements</i>	F	Use non-HAP coatings as defined in §63.2292. HAP contents shall be below 0.1 percent by mass for Occupational Safety and Health Administration-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 percent by mass for other HAP compounds.		24M

¹² Attachment 4

6 MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

FACILITY WIDE

No MRRR Required: No specific monitoring can reasonably be required for these requirements. The nature of the requirements makes it necessary to rely on the good faith of the permittee to conscientiously monitor site operations and to promptly report any deviations. The permittee is required to certify compliance with these conditions annually. Determination of compliance may be based on a reasonable and good faith effort to identify any deviations during the reporting period

1M. The permittee shall maintain records of all complaints received. Ecology shall be notified within three (3) working days of receipt of any complaints. The permittee shall address and respond to all complaints within three (3) working days of receipt of the complaint. The recordkeeping shall include the following with regard to the complaint and the associated deviation:

- 1) A record of all written complaints, complaints received by telephone or complaints received in person,
- 2) Time, date, and duration of the deviation,
- 3) Cause of the deviation,
- 4) Estimate of excess emissions and magnitude of deviation, and
- 5) Corrective action taken and the results of such action.

[WAC 173-401-615(1)(b), 09/16/02] *INCLUDES GAP-FILLING

2M. The permittee shall conduct monitoring in accordance with the following.

- 1) At least monthly, the permittee shall observe points of visible and PM emissions from emission units and activities to which opacity and/or particulate standards apply. The survey shall also be conducted when visible emissions are observed by facility personnel and reported to personnel responsible for environmental compliance. Facility personnel in general shall be made aware of their responsibility to report visible emissions
 - a) The survey shall be conducted from a location with a clear view of the emission point and where the sun is as close as possible to being directly behind the observer. The observer's location shall be at least 15 feet but not more than ¼ mile from the source.
 - i) The survey shall be conducted while the facility process associated with the emission point is in operation.
 - ii) The observer will be trained in the general procedures for determining the presence of visible emissions (i.e. effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water).

- iii) The survey shall consist of a minimum of four (4) consecutive visual observations of each stack or emission point to identify whether the emission point under observation exhibits visible emissions. The observer shall look away from the emission point under observation between each observation in order to rest their eyes.
 - iv) Records shall be made of each observation, including at least: the emission points observed, the name of the observer, the date and time of the observation, the emission points observed, weather conditions and the presence or absence of visible emissions.
- b) If visible emissions are observed to be zero, no further action is required.
- c) If visible emissions are observed—as soon as possible, but no later than 24 hours after the observation, the permittee shall verify and certify that:
 - i) The emissions are not the result of equipment malfunction, and the equipment from which the emissions are released is performing its normal, designed function.
 - ii) Air pollution control equipment, if any, is being operated in accordance with normal operating procedures.
 - iii) For fugitive emissions, reasonable precautions are being taken to minimize emissions
- d) If any of the above are not being met, corrective action must be taken as soon as possible, but no later than 72 hours from the initial observation.
- e) If, or when 3)(a), 3)(b) and 3)(c) are being met:
 - i) If no visible emissions are observed, no further action is required.
 - ii) If visible emissions exceed the applicable standard, the permittee shall initiate appropriate corrective action to address the problem and prevent further violations within 24 hours.
 - iii) Once corrective action has been taken, the permittee shall perform, or have performed, an RM9 or Method 9A test to demonstrate a return to compliance. The results of the test shall be submitted to Ecology within two working days of the test.
 - (1) For method 9, a test shall consist of certified opacity readings taken at 15-second intervals over a period of at least six consecutive minutes (24 readings).
 - (2) For method 9A, a test shall consist of certified opacity readings taken at 15-second intervals over a period of at least six consecutive minutes unless any two readings are greater than 20% opacity, in which case the testing period shall be sixty consecutive minutes or until a violation is documented.
- 2) The permittee shall maintain the following records for at least 5 years:
 - a) A list of all facility personnel trained per a), and a list of all facility personnel with current RM9 certification.
 - b) For each exceedance of the opacity standard identified under a)9)(b)(ii) above:
 - i) The date and time the exceedance was identified
 - ii) A description of the exceedance
 - iii) description of corrective action taken

- iv) Copies of all RM9 or Method 9A observations documenting an exceedance or the re-establishment of normal operations.
- 3) Any excess emission identified in 1)(e)(ii) shall be reported according to Standard Condition 2.10.1
[WAC 173-401-615(1)(b), & (3), 09/16/02], [WAC 173-401-630(1), 09/16/02]
*INCLUDES GAP-FILLING

3M. During the first period for which compliance is certified under this renewal AOP, the permittee shall perform a review of the Operation and Maintenance manuals, permit application materials (Notice of Construction, PSD) and other relevant documents (Ash Handling and Disposal Plan, Fugitive Dust Control Plan) for the purpose of evaluating compliance with each condition for which this MRRR is referenced. The focus of this review shall be to verify that plant operations are being conducted in accordance with the documents stated above and with good air pollution control practices in mind at the time of the initial review.

Subsequent annual reviews of plant operations shall be conducted to verify that any changes made since the initial document review have not resulted in operations which are inconsistent with the documents stated above or with good air pollution control practices.

The permittee shall maintain records that include the date such reviews occur as well as the name of the person conducting the review. Upon discovery that any equipment is being operated in a manner inconsistent with any of the above mentioned documents, the permittee shall initiate corrective action within two (2) business days. All such discoveries shall be reported to Ecology as required by Standard Condition 1.13.1 of this permit.

[WAC 173-401-615(1)(b), (c), 09/16/02] *INCLUDES GAP-FILLING

4M. The following shall apply generally, facility wide:

- 1) Monitoring – At least once per month the permittee shall perform complete walk-around surveys for the purpose of determining the presence of visible emissions throughout the facility site. The surveys shall be conducted while the facility is in operation, and shall include observation for any visible emissions, including fugitive emissions, regardless of the source.
- 2) Recordkeeping – Information for each survey indicating the date the survey was performed, the name of the person performing the survey, the weather at the time of the survey, an indication of whether any visible emissions were observed, a description of the cause of the visible emissions, the corrective action taken, and the results of such action.
- 3) Reporting – Monthly reporting of deviations shall be performed as described in Standard Condition 1.13.1, as well as annual certification of compliance as described in Standard Condition 1.13.3. Any monthly deviation reports documenting visible emissions observed shall include the time, date and duration of the deviation, a description of the cause of the visible emissions, the corrective action taken, and the results of the corrective action.

[WAC 173-401-615(1)(b), 09/16/02] *INCLUDES GAP-FILLING

- 5M.** The permittee shall determine the sulfur content of fuels used, except that no determination is needed for hog fuel¹³, natural gas, propane (LPG) or diesel fuel with less than 2% sulfur by weight. Information from fuel suppliers or generally published information on the sulfur content of other fuels may be referenced. Use of any fuel with sulfur content greater than 2% by weight may require a reference method source test during the use of that fuel. The permittee may certify compliance with Condition 5.1.14 if no fuels with sulfur content greater than 2% by weight are combusted.

[WAC 173-401-615(1)(b), 1/10/05]. *INCLUDES GAP-FILLING

CYCLONES AND BAGHOUSES

- 6M.** The following monitoring, recordkeeping, and reporting shall apply to baghouses #1 & #2.

- 1) Monitoring equipment
 - a) For baghouse #1
 - i) Pressure sensors and gauges at the baghouse inlet and outlet
 - ii) A pressure gauge on the reverse air cleaning system
 - iii) Access ports upstream and downstream of the baghouse to allow flow and pressure measurements
 - b) For baghouse #2
 - i) A gauge measuring differential pressure across the baghouse
 - ii) Access ports upstream and downstream of the baghouse to allow flow and pressure measurements
- 2) Recordkeeping for each baghouse shall include:
 - a) Bag failure records including the location of failed bags, and date of replacement
 - b) Records of any periods when process equipment was operated while the baghouse was off-line.
 - c) Baghouse maintenance records.
 - d) Records of any performance testing
- 3) Any instance in which process equipment was operated while the baghouse was off-line shall be included in the deviation reports required by Standard Condition 2.10.

[Order DE 94AQ-E114, 2nd Amendment, Issued 2/02/2009, Approval Conditions 3, 5, 6,],
[Order No. DE 94AQ-E111 2nd Amendment, Issued 2/02/2009, Approval Conditions 5 and 6],
[Order No. DE 99AQ-E103, Issued 01/19/99, Approval Conditions 3.1, 3.2, 3.3, 6, 6.1, 6.2, 6.3, 7.1]

- 7M.** The permittee shall create, follow, and maintain O&M manuals for baghouses #1 and #2. The O&M manuals shall be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. The O&M manual shall be reviewed at least annually, and updated within 30 days of any modifications to the baghouses or operating procedures. Emissions that result from failure to follow the requirements of the O&M manuals or manufacturer's instructions may be considered

¹³ See definition of hog fuel in Attachment 1 of SOB.

proof that the equipment was not properly operated, maintained and tested. Manufacturer's information may be referenced rather than included in the manuals. The following minimum information shall be included each manual:

- 1) Normal baghouse operating parameters
- 2) A baghouse maintenance schedule
- 3) A list of baghouse monitoring and recordkeeping requirements
- 4) A description of baghouse monitoring procedures
- 5) A full description of the monitoring instrumentation on each baghouse
- 6) A description of actions taken due to abnormal system operation
- 7) If operation of process equipment with the baghouse off-line is prevented by administrative requirements, a description of the requirements

[Order No. 94AQ-E111 2nd Amendment, Issued 2/02/2009, Approval Conditions 6, 6.1, 6.2, 6.3, 6.4, 6.5, 6.6], [Order No. 99AQ-E103, Issued 01/19/99, Approval Conditions 4, 4.1, 4.2, 4.3, 4.4, 4.5, 8.1] *INCLUDES GAP-FILLING

VENEER DRYERS 2 and 3,

8M. The following records shall be maintained.

- 1) Total veneer dryer production (expressed as 3/8 inch plywood equivalent).
- 2) Records of the operating rate of the FBC-veneer dryer system

[Order No.09AQ-E283, issued 2/02/2009, Approval Conditions 2.2], [Order No. DE 94AQ-E111, 2nd Amendment, issued 2/02/2009, Approval condition 1], [PSD-X80-01 First Amendment, Issued 02/14/03, Approval Conditions 6a], [WAC 173-401-615(1)(b), 09/16/02]

9 M. The permittee shall create, follow, and maintain O&M manuals for veneer dryers #2 and #3. The O&M manuals shall be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. The O&M manual shall be reviewed at least annually, and updated within 30 days of any modifications to the veneer dryers or operating procedures. Manufacturer's instructions may be referenced. Emissions resulting from failure to follow the requirements of the O&M manuals or manufacturer's instructions may be considered proof that equipment was not properly operated, maintained and tested. Regular maintenance records shall be kept at the facility. Manufacturer's instructions and maintenance records shall be readily accessible, available upon request, and maintained for at least 5 years. O&M manuals shall include, at a minimum:

- 1) Normal operating parameters for the dryer and emission control system,
- 2) A maintenance schedule for the dryer and emission control system
- 3) A list of all monitoring and recordkeeping requirements that apply to dryers #2 and #3
- 4) A description of any monitoring procedures that apply to dryers #2 and #3, and

- 5) A description of actions to be taken in response to abnormal control system operation.
[Order No.09AQ-E283, issued 2/02/2009, Approval Condition 3.

- 10M The permittee shall prepare O&M manuals for the RTCO and ESP. Manufacturers' instructions may be referenced. The O&M manual shall be reviewed at least annually, and updated within 30 days of any modifications to the RTCO, ESP, or operating procedures.. Emissions that result from failure to follow the requirements of the O&M manual may be considered proof that the units were not properly operated, maintained and tested. Regular maintenance records shall be kept at the facility. The O&M manual and maintenance records shall be available for inspection by Ecology, organized in a readily accessible manner, and retained for at least five years.

The O&M manual shall at a minimum include:

- 1) Normal operating parameters for the RTCO and ESP
- 2) Inspection and maintenance schedules for RTCO and ESP
- 3) Monitoring and record keeping requirements.
- 4) Actions for abnormal control system operation.
- 5) A description of startup and shutdown procedures.
- 6) If the RTCO is configured for catalytic operation, a description of catalyst conditions indicating catalyst failure

[Order No. 07AQ-E243, 1st Amendment, issued XX/XX/XXXX, Conditions 4.1, 4.1.1 through 4.1.6]

- 11M* The following testing, monitoring and recordkeeping apply to the FBB, RTCO and ESP. Records shall be kept for 5 years from the date of each occurrence, measurement, maintenance activity, or corrective action. Records shall be organized and readily available for inspection.

- 1) Source testing:
 - a) The permittee conducted an initial performance test for NO_x, CO, VOC, PM and SO₂ with the oxidizer operating in thermal mode on March 5, 2009. Following the initial test, testing for NO_x, CO, VOC and PM shall be repeated every 12 months until the oxidizer has been tested 3 times. VOC shall be measured at the oxidizer inlet as well as at the exhaust. Following the first 3 tests, Ecology may approve a reduction in testing frequency to not less than once every 5 years.
 - b) The permittee shall conduct an initial performance test for NO_x, CO, VOC, PM and SO₂ within 180 days of startup in catalytic mode. VOC and CO shall be measured at the oxidizer inlet as well as at the exhaust. Following the initial test, testing for NO_x, CO, VOC and PM shall be repeated every 12 months until the oxidizer has been tested 3 times. Following the first 3 tests, Ecology may approve a reduction in testing frequency to not less than once every 5 years.
- 2) Testing shall be conducted according to MRRR 19M
- 3) Monitoring: the permittee shall monitor and maintain records of the following:

- c) For each ESP T-R set, daily records of:
 - i) Primary and secondary voltage
 - ii) Spark rate
 - iii) Silicon Controlled Rectifier (SCR) conduction angle
 - iv) T-R set status
- d) RTCO natural gas usage, by month
- e) Startup and shutdown records for the RTCO and ESP, maintained per MRRR 21M.
- f) Nature and details of RTCO and ESP malfunction, including date, time, duration, cause and corrective action taken, maintained per MRRR 21M.
- g) Maintenance and inspection records for all pollution control equipment
- h) FBC operating rate

[Order No. 07AQ-E243, 1st Amendment, Issued XX/XX/2009, Approval Conditions 5.1, 5.1.1, 5.2.3, 5.2.3.1 through 5.2.3.3, 5.2.4, 5.2.5, 5.2.6 & 5.2.7], [PSD-X80-01 First Amendment, Issued 02/14/03, Approval Conditions 6a]

12M. Monitoring, Recordkeeping, and Reporting as required by 40 CFR 64 – CAM shall be subject to the following general conditions:

- 1) **Applicability:** The compliance assurance monitoring (CAM) requirements in 40 CFR Part 64 apply to the FBB with respect to the particulate emission limitations identified in Condition 5.3.2 and the sulfur dioxide emission limitations identified in Conditions 5.1.4 and 5.3.4.
- 2) **Monitoring Operation:** Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring at all times that the pollutant-specific emissions unit is operating.
Data recorded during monitoring malfunctions¹⁴, associated repairs, and required quality assurance or control activities shall not be used for CAM purposes, including data averages and calculations, or fulfilling a minimum data availability requirement. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system.[40 CFR 64.7(c) 10/22/97]
- 3) **Proper maintenance:** At all times, the permittee shall maintain the monitoring, including maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b) 10/22/97]
- 4) **Minimum data availability:** The permittee shall recover valid monitoring data for at least 90% of the time the emission unit is required to be monitored each month.[40 CFR 64.6(c)(4) 10/22/97]

¹⁴ A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

- 5) Response to excursions¹⁵ or exceedances¹⁶: An excursion shall occur whenever an indicator is not within the range or limit in Table 12M.1. and 12M 2. The permittee shall respond to excursions by restoring the pollutant-specific emission unit to normal operation (i.e. indicators returned to within range) as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions).
- a) Corrective actions may include: initial inspection and evaluation, documenting that operations returned to normal without operator action, follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard
 - b) All excursions shall be included in the monthly deviation report required by standard condition 2.10.1. Any excursion in which the unit cannot be returned to within the indicator range within 24 hours of discovery shall be considered an exceedance, and identified as such in the monthly deviation report.
 - c) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. [40 CFR 64.7(d)(2) (10/22/97)]
 - d) Upon discovery that the monitoring as designed is insufficient to provide indications of all deviations, the permittee shall notify Ecology of the monitoring deficiency. Notification shall be included in the monthly deviation report.
- 6) CAM Recordkeeping
- a) The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan(s) required as well as any activities undertaken to implement a quality improvement plan, and any other required supporting information (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Records shall be maintained for a period of 5 years. [40 CFR 64.9(b)(1) (10/22/97)]
 - b) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements. [40 CFR 64.9(b)(2) (10/22/97)]

¹⁵ An *excursion* is any departure from an indicator range established for monitoring, consistent with any averaging period specified for averaging the results of the monitoring.

¹⁶ An *exceedance* is any condition detected by monitoring that provides data in terms of an emission limitation and that indicates that emissions are greater than the limitation, consistent with any averaging period specified.

- 7) CAM Reporting: The semi-annual monitoring report required by Standard Condition 2.10.2 shall include the following:
 - a) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions of exceedances, as applicable, and the corrective actions taken,
 - b) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks),
 - c) A description of any actions taken during the reporting period to implement any QIP's in effect,
 - d) Any notice required by 40 CFR 64.7(e) of the failure of CAM monitoring to indicate an excursion or exceedance during a period in which the permittee identified a failure to meet an emission limitation [40 CFR 64.9(a)(2)(i),(ii),(iii) and 64.7(e) (10/22/97)]
- 8) Annual Compliance Certification: The compliance certification required by Standard Condition 2.10.3 shall identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance has occurred.[40 CFR 70.6(c)(5)(iii)(C) (6/27/03)]

Table 12M.1 Hog Fuel Boiler CAM				
Pollutant-specific emission limit	Indicator	Monitoring Method	Monitoring Frequency	Quality Assurance Requirements
PM limit referenced in Condition 5.7.5	2-day average multiclone Δp between 1" & 5" w.c.	Direct read	8 hours	Follow manufacturer's calibration, inspection, maintenance, and operating requirements
	2-day average EFB Δp less than 6" w.c.	Direct read	8 hours	
	2-day average EFB bed voltage greater than 5.0 kV	Direct read	8 hours	
	2-day average EFB ionizer voltage greater than 20 kV	Direct read	8 hours	

Table 12M.2 FBC CAM				
Pollutant-specific emission limit	Indicator	Monitoring Method	Monitoring Frequency	Quality Assurance Requirements
PM limit referenced in Condition 5.6.2	Total power input	To be determined	To be determined	Follow manufacturer's calibration, inspection, maintenance, and operating requirements

HOGGED FUEL BOILER AND ELECTRIFIED FILTER BED

13M. The following monitoring, recordkeeping, and reporting shall apply to the hogged fuel boiler and the electrified filter bed. Requirements that specify a unit or process apply only to that process. Requirements that are stated generally, apply generally.

1) The following monitoring shall be performed and equipment installed as specified:

a) A daily monitoring log shall be maintained with the following parameters for the electrified filter bed/multiclone control system recorded at least once per day:

- i) EFB Bed voltage (KVDC),
- ii) EFB Ionizer voltage (KVDC),
- iii) EFB Ionizer current (Amps),
- iv) EFB Inlet temperature (°F),
- v) EFB Outlet temperature (°F),
- vi) EFB differential pressure (in. w.c.),
- vii) Multiclone differential pressure (in. w.c.),
- viii) Date and time.

b) A daily monitoring log shall be maintained with the following parameters for the hogged fuel boiler recorded at least once per day:

- i) Steam production (lbs/hour),
- ii) Stack temperature (°F),
- iii) Boiler O₂ (%),
- iv) Pressure (in. w.c.) at the following locations: boiler under grate, boiler outlet, furnace pressure, F.D. fan outlet, and furnace draft,
- v) Date and time.

c) Equipment shall continue to be operated providing continuous measurement of the oxygen content (% O₂) of the hogged fuel boilers exhaust gas. The continuous measurement equipment shall conform to 40 CFR 60, Appendix B, Performance Specification 3. The Quality Assurance Plan as submitted to Ecology shall be updated upon request by Ecology

2) Reporting:

a) The following shall be included in the Monthly Deviation Reports required by Standard Condition 2.10.1.

- i) Any exceedance of the limits in 5.7.1, 5.7.2. and 5.7.3:
- ii) Any failure to conduct the monitoring required by 13M 1)a), b) and c)

[PSD-X80-01 First Amendment, Issued 02/14/03, Approval Condition 6b], [Order No. DE 91AQ-E123, 1st Amendment, Issued 2/2/2009, Approval Conditions (1), (5), (6) & (7)]

14M. Periodic performance testing shall be conducted on the emissions from the electrified filter bed (controlling the hogged fuel boiler) stack at least once every 60 calendar

months. The testing cycle shall be measured from the December 9, 2004 test. The following conditions shall apply to all future testing:

- 1) Particulate matter shall be reported for front-half (RM 5) and back-half (RM 202). Particulate matter emissions shall be reported in grains per dry standard cubic foot of exhaust gas (gr/dscf) as well as pounds per hour (lb/hr).
- 2) The testing shall consist of at least three (3) runs, with the boiler operating at a minimum of ninety (90) percent of maximum production rate. The maximum production rate shall be the highest weekly average production rate over the past two (2) years. The boiler shall be operated by the normal boiler operator during stack testing.
- 3) The testing will consist of two runs at normal boiler operation and one run including grate ash cleaning and/or soot blowing. A weighted average of the three runs shall be used to calculate emissions.
- 4) All monitored boiler and control device operating parameters shall be recorded during the entire duration of the testing and included in the test report.

[Order No. DE 91AQ-E123, 1st Amendment, Issued 2/2/2009, Approval Conditions 1(c) & (d), 2, 3], [WAC 173-401-615(1)(b), 09/16/02], [WAC 173-401-630(1), 09/16/02]

*INCLUDES GAP-FILLING

15M. Monitoring – A Continuous Opacity Monitoring System (COMS) which meets the approval requirements of the Environmental Protection Agency, is installed and shall be maintained. The COMS shall conform to all provisions of Title 40, CFR Part 60, Appendix B, *Performance Specification 1 – Specifications and Test Procedures for Opacity Continuous Emissions Monitoring Systems in Stationary Sources*. The COMS shall be operated using quality assurance procedures conforming to EPA 340/1-86-010, *Recommended Quality Assurance Procedures of Opacity CEMS*. The permittee shall prepare a Quality Assurance (QA) Plan outlining the quality assurance procedures used to verify the reliability of the COMS data. Such a document shall specify the frequency at which each quality assurance procedure will be performed.

Recordkeeping – The permittee shall maintain the following records related to the QA Plan and COMS. Such records shall be retained for a period of at least five (5) years and shall be well organized and readily accessible for inspection by Ecology personnel:

- 1) A copy of the QA Plan,
- 2) Records of all quality assurance procedures performed for a period of five (5) years, and
- 3) Chart recorder readings or computer file data from the COMS.

Reporting – The QA Plan shall be submitted to Ecology no later than sixty (60) days following the effective date of this AOP, and shall be subject to Ecology approval.

[Order No. DE 91AQ-E123, 1st Amendment, Issued 2/2/2009, Approval Condition 1(b)], [WAC 173-401-630(1), 09/16/02] *INCLUDES GAP-FILLING

16M. The permittee shall create, follow, and maintain O&M manuals for the hogged fuel boiler, multiclone and EFB. The O&M manuals shall be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. The O&M

manual shall be reviewed at least annually, and updated within 30 days of any modifications to the RTCO and ESP or operating procedures.

Emissions that result from failure to follow the requirements of the O&M manuals or manufacturer's instructions may be considered proof that the equipment was not properly operated, maintained and tested. Manufacturer's information may be referenced rather than included in the manuals.

[Order No. DE 91AQ-E123, 1st Amendment, Issued 2/2/2009, Approval Condition 4]

17M. The maximum hourly average production rate for the hogged fuel boiler shall be determined as follows:

- 1) For the period May 1st through September 30th, the maximum rate shall be 40,000 lbs steam/hour.
- 2) For the period October 1st through April 30th, the maximum rate shall be 45,000 lbs steam/hour.
- 3) Steam production rates recorded during each source test shall establish maximum hourly average steam production rates, except that they shall not exceed the production rate limits specified in 1) and 2) above.

[Order No. DE 91AQ-E123, 1st Amendment, Issued 2/2/2009, Approval Conditions 2, 5]

18M. The following conditions shall apply to use of the hogged fuel boiler abort gate:

- 1) The abort gate shall be used only in emergency situations caused by one of the following:
 - a) Failure of the EFB FD fan,
 - b) Fire in the EFB system,
 - c) Power outage to the EFB, or
 - d) Plugging of the EFB filter media.
- 2) Whenever the abort gate is used, fuel feed to the boiler must be stopped and the boiler taken off line.
- 3) Any time the abort gate is used, the permittee shall notify Ecology by telephone or fax no later than the next business day, and in writing within 5 days.
- 4) Records documenting the nature and details of any situation in which the abort gate located downstream of the multiclone on the hogged fuel boiler is utilized and boiler exhaust gases bypass the EFB shall be maintained.
- 5) Under no circumstances shall the boiler be operated when exhaust gases bypass the EFB.

[Order No. DE 91AQ-E123, 1st Amendment, Issued 2/2/2009, Approval Condition 6]

19M: PCWP MACT Testing*

- 1) To demonstrate initial compliance with the compliance options and operating requirements, the permittee must conduct performance tests and establish each site-specific operating requirement in Table 2 to this subpart according to the requirements in 40 CFR 63.2262 and 40 CFR 63 Subpart DDDD Table 4.
- 2) The permittee must conduct each performance test according to the requirements in 40 CFR 63.7(e)(1)-(3), the requirements in 40 CFR 63.2262 (a) through (e), (g)(1), (h),(j), (k) and (l) and according to the methods specified in 40 CFR 63 Subpart DDDD Table 4 (1) through (5).
- 3) The permittee must conduct initial performance tests no later than March 30, 2009.

[Order No. 07AQE- 243, 1st Amendment, Issued XX/XX/2009, Approval Condition 2.1],

20M: PCWP MACT Monitoring

- 1) The permittee must install, operate, and maintain each continuous parameter monitoring system (CPMS) according to
 - a) 40 CFR 63.2269 (a)(1) through (3) *General continuous parameter monitoring requirements*:
 - b) 40 CFR 63.8(c) *Operation and maintenance of continuous monitoring systems*. (1) through (4), (5) and (8)
 - c) 40 CFR 63.8(d) *Quality Control Program*. (1) through (3)
 - d) 40 CFR 63.8(e) *Performance Evaluation Of Continuous Monitoring Systems* (1) through (5)
 - e) 40 CFR 63.8(g) *Reduction of Monitoring Data* (5)
- 2) For each temperature monitoring device, the permittee must meet the requirements in 40 CFR 63.2269 (b) *Temperature monitoring, (1) through (6)*
- 3) The permittee shall monitor and collect data according to 40 CFR 63.2270 (b), (c), (d) and (f).

21 M: PCWP MACT Recordkeeping

- 1) The permittee must keep the following records
 - a) A copy of each notification and report that the permittee submitted to comply with 40 CFR 63 Subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
 - b) Startup, shutdown, and malfunction plan records required by 40 CFR 63.6(e)(3)(iii) through (v).
 - c) Startup, shutdown, and malfunction records required by 40 CFR 63.10(b)(2)(i) through (v).
 - d) Documentation of the approved routine control device maintenance exemption for the RTO, including the information required for §63.2281(c)(5).

- e) CPMS records required by 40 CFR 63.10 (b)(2)(vi) through (xi).
 - f) CPMS records required by 40 CFR 63.10(c)(1), (5) through (8) and (10) through (14).¹⁷
 - g) If operating a catalytic oxidizer, records of annual catalyst activity checks and subsequent corrective action.
- 2) The permittee must maintain records in a form suitable and readily available for expeditious review as specified in 40 CFR 63.10(b)(1)
 - 3) Keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records must be kept on site for at least two years, and may be kept offsite for the remaining three years.

[40 CFR 63.2282, 2283, 7/30/2004]

22M PCWP MACT Notification*

- 1) The permittee submit the following notifications by the dates specified
 - a) 40 CFR 63.7(b)(1) *Notification of performance test*, at least 60 days prior to test
 - b) 40 CFR 63.7(b)(2) *Notification of delayed performance test* as soon as practicable.
 - c) 40 CFR 63.7 (c) *Site specific test plan* at least 60 days prior to test
 - d) 40 CFR 63.8(e) *Notification of CMS Performance evaluation* at least 60 days prior to evaluation
 - e) 40 CFR 63.8(f)(4) *Request to use alternative monitoring procedure*, if applicable
 - f) 40 CFR 63.8 (f)(6) *Alternative to RATA*, if applicable
 - g) 40 CFR 63.9(b) *Initial applicability notification*
 - h) 40 CFR 63.9(c) *Request for compliance extension*, if applicable
 - i) 40 CFR 63.9(d) *Special compliance requirements*, if applicable
 - j) 40 CFR 63.9(e) *Notification of performance test*
 - k) 40 CFR 63.9(g)(1) *Notification of date of CMS performance evaluation*
 - l) 40 CFR 63.9(h)(2)(ii) *Notification of Compliance Status* for each performance test, design evaluation or other initial compliance demonstration as specified in Tables 4, 5 and 6.
 - i) For each initial compliance demonstration that does not require a source test, submit notification within 30 calendar days.
 - ii) For each initial compliance demonstration that requires a source test, submit notification within 60 calendar days of test completion
 - m) Request for routine control device maintenance exemption per 63.2251 no later than 30 days before the compliance date.
 - n) Notify EPA Administrator at least 30 days before:
 - i) Modifying or replacing the control system for any process unit subject to the compliance options and operating requirements
 - ii) Changing a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter.

[40 CFR 63.2280 (a),(b),(c),(d),(e), (g)(1)&(2), 7/30/2004].

¹⁷ The facility startup, shutdown and malfunction plan or records may satisfy the requirements of §63.10 (c)(10) through(12)

23M: PCWP MACT Reports

The permittee must submit the following reports from 40 CFR 63, Subpart DDDD, Table 9.

- 1) A semi-annual compliance report containing the following:
 - a) The information in 40 CFR 63.2281(c)(1) through (8)
 - b) For each deviation from a compliance option or operating requirement and for each deviation from the work practice requirements in 40 CFR 63, Subpart DDDD, Table 8¹⁸ where a CMS is not used to comply with the compliance options, operating requirements or work practice requirements, the information in 40 CFR 63.2281 (c)(1) through (6) and 40 CFR 63.2281 (d)(1) and (2). This includes periods of startup, shutdown, and malfunction and routine control device maintenance.
 - c) For each deviation from a compliance option or operating requirement where a CMS is used to comply with the compliance options or operating requirements the report must include the information in 40 CFR 63.2281 (c)(1) through (6) and 40 CFR 63.2281 (e)(1) through (11). This includes periods of startup, shutdown and malfunction and routine control device maintenance.

The report must cover the semi-annual periods from January 1 through June 30 and July 1 through December 31. Reports must be postmarked or delivered no later than July 31 for the reporting period ending on June 30 or January 31 for the reporting period ending December 31.

The report must include all deviations as defined in subpart DDDD¹⁹. Submittal of a complete report will satisfy any obligation to report the same deviations in the semi-annual monitoring report required by standard condition 2.10.2 of the AOP.

- 2) An immediate startup, shutdown, and malfunction report for a startup, shutdown, or malfunction during the reporting period when action taken is not consistent with the startup, shutdown, and malfunction plan in MRRR 26M. The report must contain the following, as required by 40 CFR 63.10(d)(5):
 - a) An immediate report of actions taken, submitted by telephone or fax within 2 working days of commencing actions inconsistent with the SSM plan
 - b) A follow-up report by letter, postmarked within 7 working days after the end of the event that contains the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, describing all excess emissions and/or parameter monitoring exceedances which are believed to have occurred (or could have occurred in the case of malfunctions), and actions taken to minimize emissions in conformance with §63.6(e)(1)(i).

[40 CFR 63.2281, 7/30/04]

24M. For Group 1 Miscellaneous Coating Operations

- 1) Submit a signed statement that non-HAP coating are being used. The statement must be included in the Notification of Compliance Status in MRRR 22M 1)k)

¹⁸ Attachment 8

¹⁹ See *Definitions* in Section 16 of Statement of Basis

- 2) Continue to use non- HAP coatings and keep records showing that only non-HAP coatings are used.
- 3) Any use of coatings not meeting the definition of non-HAP coating in 40 CFR 63.2292 must be reported as a deviation in the Compliance Report required by MRRR 23M.

[40 CFR 63.2241(a), 63.2260(b),(c), 63.2271(b), 63.2281, 40 CFR 63, Subpart DDDD, Tables 6(5)²⁰, 8(5)²¹ and 9]

25M. For fugitive emissions from dryer doors

- 1) Develop a plan for review and approval for minimizing fugitive emissions from the veneer dryer heated zones, and submit the plan with the Notification of Compliance Status required by MRRR 22M 1)k) .
- 2) Maintain records documenting that the plan for minimizing fugitive emissions is being followed.
- 3) Any failure to follow the plan must be reported as a deviation in the Compliance Report required by MRRR 23M.

[40 CFR 63.22241, 63.2260(b),(c), 63.2265, 63.2271(a),(b), 63.2281, 40 CFR 63, Subpart DDDD, Tables 6(3), 8(5) and 9(1) & (2)²², 40CFR 63.2282 (b)]

26M. Startup, Shutdown and Malfunction Plan

- 1) The permittee must develop a written startup, shutdown and malfunction plan including the information in §63.6(e)(3)(i) by the compliance date in Subpart DDDD. A current SSM plan must be maintained at the affected source, and available upon request by Ecology or the EPA. Elements of the SSM plan are not applicable requirements as defined in 40 CFR 70.2, and are not subject to the permit shield.
- 2) The SSM plan may be periodically revised according to §63.6(e)(3)(vii) or (viii). Revisions to the SSM plan do not constitute permit revisions. Copies of any superseded versions of the SSM plan must be maintained at the source for at least 5 years.
- 3) SSM records must be kept according to MRRR 21M 1)b).
- 4) SSM events shall be reported according to MRRR 23M.

[40 CFR 63.6(e)(3) (i) through (ix)], [40 CFR 63.10(d)(5)(i), (ii)]

²⁰ Attachment 6

²¹ Attachment 8

²² Attachment 9

7. PERMIT SHIELD CONDITIONS

- 7.1 Permit Shield.** Compliance with the terms of this Title V permit shall be deemed compliance with the applicable requirements upon which that condition is based, as of the date of permit issuance. The permit shield does not apply to any insignificant emissions units or activity designated under WAC 173-401-530.
- 7.2 Inapplicable or Exempt Requirements.** The requirements shown in Table 7.1, as of the date of permit issuance, have been determined not to apply to the source, or to the specific emission units or activities indicated. Commencing the date of permit issuance, the permit shield shall cover the requirements so identified. Applicability of a requirement may be triggered by a future action or emissions increase.
- 7.3 One-time requirements.** The requirements shown in Table 7.2 are not included in the AOP because they are one-time requirements which have been met. Commencing the date of permit issuance, the permit shield shall cover the requirements so identified.
- 7.4 Streamlined Requirements.** The requirements summarized in Table 7.3 are not included in the AOP because they are less restrictive than, or redundant to, requirements included in the AOP. Commencing the date of permit issuance, the permit shield shall cover the requirements so identified.

Table 7.1: The following table includes only requirements for which inapplicability is based on a determination or comparison of size, age, emissions or other characteristic of the emission unit with the applicability criteria in the requirement. Some of the requirements listed below may become applicable during the permit term due to an invoking event, but are deemed inapplicable at the time of permit issuance. Requirements which are subject to terms of this permit, requirements which are inherently inapplicable (i.e., the source is not in the category subject to a regulation), or requirements which apply only to regulatory agencies are not included

Emission Unit or Activity	Requirement	Description	Basis of non-applicability
Riley Boiler	40 CFR 60, Subpart Dc	Standards of Performance for steam generating units for which construction, modification, or reconstruction commenced after June 9, 1989	The boiler was constructed prior to June 9, 1989, and has not been reconstructed
Riley Boiler	40 CFR 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters	The boiler is an affected source as defined in 40 CFR 63.7490. Subpart DDDDD was vacated by the United States Court of Appeals on June 8, 2007. At the time of issuance, the requirements of Subpart DDDDD are not applicable
Riley Boiler	40 CFR 64	Compliance Assurance Monitoring (CAM) for NO _x , CO, VOC and Mercury emissions.	The boiler does not use control devices to comply with limits on NO _x , CO, VOC and mercury emissions.
Riley Boiler	40 CFR 60, Subpart CCCC	Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for which construction is commenced after November 30, 1999 or for which modification or	The boiler does not meet the definition of Commercial and Industrial Solid Waste Incineration Unit in 40 CFR 68.2875.

		reconstruction is commenced on or after June 1, 2001	
FBC	40 CFR 64	Compliance Assurance Monitoring (CAM) for NOx, CO Mercury emissions.	The FBC does not use control devices to comply with limits on NOx, CO and mercury emissions
FBC	40 CFR 64	Compliance Assurance Monitoring (CAM) for VOC	Emission limitations or standards proposed after November 15, 1990 pursuant to section 111 or 112 of the Clean Air Act are exempt.
FBC	40 CFR 60, Subpart CCCC	Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for which construction is commenced after November 30, 1999 or for which modification or reconstruction is commenced on or after June 1, 2001	The FBC does not meet the definition of Commercial and Industrial Solid Waste Incineration Unit in 40 CFR 68.2875
Veneer dryers	63.6(h)(1)-(9)	Requirements for opacity and visible emission standards.	Does not apply to Subpart DDDD.

Table 7.2: One-time requirements which have been met.

1. Order No. DE 99AQ-E103, Issued 01/19/99, Approval Condition 5.2: Complete O&M manual.
2. Order No. DE 99AQ-E103, Issued 01/19/99, Approval Condition 5.1: written notification of baghouse startup.
3. Order No. DE 99AQ-E103, Issued 01/19/99, Approval Condition 9.2: commence baghouse construction within 18 months.
4. Order No. DE 79-421, Issued 09/18/79, Approval Condition 1: Initial source testing.
5. PSD-X80-01 First Amendment, Issued 02/14/03, Approval Condition 4: construction not discontinued for 18 months.
6. Order No. DE 78-459, Issued 10/24/78,: Compliance schedule.
7. Order No. DE 91AQ-E123, 1st Amendment, Issued 2/2/2009, Approval Condition 9: prepare solid waste disposal plan.
8. Order No. DE 91AQ-E123, 1st Amendment, Issued 2/2/2009, Approval Condition 1(b): Installation of COMS
9. Order No. DE 91AQ-E123, 1st Amendment, Issued 2/2/2009, Approval Condition 1(c): collect data during initial source test,
10. Order No. DE 91AQ-E123, 1st Amendment, Issued 2/2/2009, Approval Condition 2: Source test within 180 days.
11. Order No. DE 91AQ-E123, 1st Amendment, Issued 2/2/2009, Approval Condition 4: Complete O&M manual
12. Order No. DE 91AQ-E123, 1st Amendment, Issued 2/2/2009, Approval Condition 7,: Install exhaust gas O2 monitor.
13. Order No. 07AQ-E243, 1st Amendment, Issued XX/XX/2009, Approval Condition 2.1, Conduct initial performance test before 3/30/2009.
14. Order No.DE79-471, Issued 9/18/1979, Condition 1, Conduct a performance test within 90 days of “the boiler” becoming operational. There is no other reference to a boiler in the Order and no record of any boiler source test. A letter from the permittee to Ecology dated 4/22/1980 refers to an “understanding” that no hog fuel boiler stack test would be required if the permittee took certain actions. The letter goes on to list 5 actions that have been taken. There is no reference in subsequent correspondence to any requirement for a hog fuel boiler stack test.

Table 7.3: Streamlining

1. Order No. 07AQER-243, 1st amendment, Condition 1.1: Operation of the ESP and RTCO.
This condition is redundant with 40 CFR 63.2250(a), cited in condition 5.8.2 and 40 CFR 63.2250(c), cited in condition 5.8.4.
2. Order No. 07AQER-243, 1st amendment, Condition 1.3.1: Maintaining the 3-hour block average catalyst temperature.
This condition is redundant with 40 CFR 63, Subpart DDDD, Table 2(2), cited in condition 5.9.1.4
3. Order No. 07AQER-243, 1st amendment, Condition 1.3.2: Check catalyst activity annually.
This condition is redundant with 40 CFR 63, Subpart DDDD, Table 2(2), cited in condition 5.9.1.5.
4. Order No. 07AQER-243, 1st amendment, Condition 1.4: Maintaining the 3-hour block average firebox temperature in thermal mode.
This condition is redundant with 40 CFR 63, Subpart DDDD, Table 2(1) condition, cited in condition 5.9.1.2.
5. Order No. 07AQER-243, 1st amendment, Condition 2.2: Notification of performance test.
This condition is redundant with 40 CFR 63.7(b)(1), cited in MRRR 22M 1)a).
6. Order No. 07AQER-243, 1st amendment, Condition 2.3: Performance test under representative operating conditions.
This condition is redundant with 40 CFR 63.2262(b)(2), cited in MRRR 19M 2).
7. Order No. 07AQER-243, 1st amendment, Condition 5.2.1: Records of 3-hour block firebox temperatures.
This condition is redundant with 40 CFR 63.2282 (b), cited in MRRR 21M.
8. Order No. 07AQER-243, 1st amendment, Condition 5.2.2.1: Records of 3-hour block average catalyst temperatures.
This condition is redundant with 40 CFR 63.2282 (b), cited in MRRR 21M.
9. Order No. 07AQER-243, 1st amendment, Condition 5.2.2.2: Records of annual catalyst activity checks.
This condition is redundant with 40 CFR 63.2282 (b), cited in MRRR 21M.
10. Order No. DE99AQ-E103, Condition 1, no limits on operating hours.
This condition does not require any action on the part of the permittee or Ecology.
11. Order No. DE99AQ-E103, Condition 7.3, report annual PM emissions.
This condition is redundant with Standard Condition 2.10.4, *Emission Inventory*.
12. Order No. DE99AQ-E103, Condition 7.2, report source test results.
This condition is redundant with Standard Condition 4.4.3, *Test Reports*

13. WAC 173-400-070(2)(a), “Hog fuel boilers shall meet all provisions of WAC 173-400-040 and 173-400-050(1), except that emissions may exceed twenty percent opacity for up to fifteen consecutive minutes once in any eight hours.”
Condition 5.7.1 limits opacity from the hog fuel boiler stack to not more than 10% for more than 6 minutes in one hour. The limit in condition 5.7.1 is more restrictive, and the limit in WAC 173-400-070(2)(a) is not included in the AOP.
14. WAC 1730-400-050(1) limits emissions of particulate material from combustion and incineration units to less than 0.2 grains/dscf of exhaust gas.
Condition 1 of PSD-X80-01(referenced in condition 5.6.2 of the AOP) limits emissions of particulate matter from the FBC stack to less than 0.04 gr/dscf.
Condition 1(a) of Order No. DE91AQ-E123, 1st Amendment (referenced in condition 5.7.4 of the AOP) limits emissions of particulate matter to less than 0.030 gr/dscf.
The limits in Orders PSD-X80-01 and DE91AQ-E123, 1st Amendment are more stringent than WAC 1730-400-050(1), and the WAC limit is not included.

Attachment 1: Routine Control Device Maintenance Exemption

Boise Wood Products
1274 Boise Road
Kettle Falls, WA 99141



August 7, 2008

COPY

Nancy Helm
Manager – Federal and Delegated Air Programs Unit
EPA Region X
1200 Sixth Avenue (AWT – 107)
Seattle, WA 98101

Dear Ms. Helm:

Re: PCWP MACT (40 CFR Part 63, Subpart DDDD) Request for Routine Control Device Maintenance Exemption for: Boise Building Solutions Manufacturing, LLC – Kettle Falls Plywood, Title V AOP No. 03AQER-5613.

Boise Building Solutions Manufacturing, LLC (Boise) Kettle Falls Plywood Plant (the Facility) is subject to the Plywood and Composite Wood Panel (40 CFR Part 63, Subpart DDDD) MACT Standard (the Standard). The softwood veneer dryers at the Facility are subject to an emission limitation under the Standard, and Boise has installed a regenerative thermal oxidizer (RTO) to control the emissions from the heated zone of the veneer dryers. Boise is requesting a routine control device maintenance exemption for the RTO in accordance with §63.2251 of the Standard.

The exemption is justifiable because the unit routinely requires internal inspections and repairs, bakeouts, replacement of parts, and media replacement. Due to the high internal heat during normal operations, these maintenance activities cannot be performed while the unit is operating. Based on other units within the company, it typically requires 12 hours to cool down prior to entry by maintenance personnel and another 4 hours to heat up after maintenance is completed. Routine maintenance activities require from 1 hour for inspections to 40 hours for a full media replacement.

The Facility typically operates 24 hours/day, 7 days/week with one day shutdowns for holidays. The Facility schedules these routine maintenance activities when the Facility is shut down for holiday. However, due to the length of time these activities may require, including cool-down and warm up, the facility cannot always complete the activities during the holiday shutdown.

Ms. Nancy Helm
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August 7, 2008

To minimize emissions during maintenance, the Facility will, to the extent practical, perform the routine maintenance activities during process shutdowns. In addition, when the maintenance activity, including cool-down and warm-up cannot be completed while the dryers are shut down, the Facility will minimize emissions to the extent practical by: Ensuring that the dry electrostatic precipitator upstream of the RTO is operating during the period.

The routine control device maintenance exemption allowed for softwood veneer dryers under §63.2251 (b)(2) is 0.5% of the annual process operating uptime. Considering the plants normal operating schedule of approximately 8,400 hours/year, the exemption allows for approximately 42 hours per year of process operation when the RTO is off-line for routine maintenance.

We would appreciate your prompt approval of our request. Please contact Jennifer Wasley at 509-738-3219 if you need additional information.

Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

Sincerely,



Thomas A. Insko
Inland Region Manager

cc: Dave Wendland, Washington Dept. of Ecology
Jennifer Wasley, Region Environmental Manager

Attachment 2: Required Data Elements for 2011 Emission Inventory

TABLE 2a TO APPENDIX A OF SUBPART A—DATA ELEMENTS FOR REPORTING ON EMISSIONS FROM POINT SOURCES,
WHERE REQUIRED BY 40 CFR 51.30

Data elements	Every-year reporting	Three-year reporting
(1) Inventory year	✓	✓
(2) Inventory start date	✓	✓
(3) Inventory end date	✓	✓
(4) Contact name	✓	✓
(5) Contact phone number	✓	✓
(6) FIPS code	✓	✓
(7) Facility ID codes	✓	✓
(8) Unit ID code	✓	✓
(9) Process ID code	✓	✓
(10) Stack ID code	✓	✓
(11) Site name	✓	✓
(12) Physical address	✓	✓
(13) SCC	✓	✓
(14) Heat content (fuel) (annual average)	✓	✓
(15) Heat content (fuel) (ozone season, if applicable)	✓	✓
(16) Ash content (fuel) (annual average)	✓	✓
(17) Sulfur content (fuel) (annual average)	✓	✓
(18) Pollutant code	✓	✓
(19) Activity/throughput (for each period reported)	✓	✓
(20) Summer day emissions (if applicable)	✓	✓
(21) Ozone season emissions (if applicable)	✓	✓
(22) Annual emissions	✓	✓
(23) Emission factor	✓	✓

TABLE 2a TO APPENDIX A OF SUBPART A—DATA ELEMENTS FOR REPORTING ON EMISSIONS FROM POINT SOURCES,
WHERE REQUIRED BY 40 CFR 51.30—Continued

Data elements	Every-year reporting	Three-year reporting
(24) Winter throughput (percent)	✓	✓
(25) Spring throughput (percent)	✓	✓
(26) Summer throughput (percent)	✓	✓
(27) Fall throughput (percent)	✓	✓
(28) Hr/day in operation	✓	✓
(29) Day/wk in operation	✓	✓
(30) Wk/yr in operation	✓	✓
(31) X stack coordinate (longitude)	✓
(32) Y stack coordinate (latitude)	✓
(33) Method accuracy description (MAD) codes	✓
(34) Stack height	✓
(35) Stack diameter	✓
(36) Exit gas temperature	✓
(37) Exit gas velocity	✓
(38) Exit gas flow rate	✓
(39) NAICS at the Facility level	✓
(40) Design capacity (including boiler capacity if applicable)	✓
(41) Maximum generator nameplate Capacity	✓
(42) Primary capture and control efficiencies (percent)	✓
(43) Total capture and control efficiency (percent)	✓
(44) Control device type	✓
(45) Emission type	✓
(46) Emission release point type	✓
(47) Rule effectiveness (percent)	✓
(48) Winter work weekday emissions of CO (if applicable)	✓

Attachment 3: 40 CFR 63, Subpart DDDD, Tables 1B & 2

Table 1B to Subpart DDDD of Part 63—Add-on Control Systems Compliance Options

For each of the following process units . . .	You must comply with one of the following six compliance options by using an emissions control
Fiberboard mat dryer heated zones (at new affected sources only); green rotary dryers; hardboard ovens; press predryers (at new affected sources only); pressurized refiners; primary tube dryers; secondary tube dryers; reconstituted wood product board coolers (at new affected sources only); reconstituted wood product presses; softwood veneer dryer heated zones; rotary strand dryers; conveyor strand dryer zone one (at existing affected sources); and conveyor strand dryer zones one and two (at new affected sources)	(1) Reduce emissions of total HAP, measured as THC (as carbon) ^a , by 90 percent; or
	(2) Limit emissions of total HAP, measured as THC (as carbon) ^a , to 20 ppmvd; or
	(3) Reduce methanol emissions by 90 percent; or
	(4) Limit methanol emissions to less than or equal to 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd; or
	(5) Reduce formaldehyde emissions by 90 percent; or
	(6) Limit formaldehyde emissions to less than or equal to 1 ppmvd if uncontrolled formaldehyde emissions entering the control device are greater

^aYou may choose to subtract methane from THC as carbon measurements.

Table 2 to Subpart DDDD of Part 63—Operating Requirements

If you operate a(n) . . .	You must . . .	Or you must . . .
(1) Thermal oxidizer	Maintain the 3-hour block average firebox temperature above the minimum temperature established during the performance test	Maintain the 3-hour block average THC concentration ^a in the thermal oxidizer exhaust below the maximum concentration established during the performance test.
(2) Catalytic oxidizer	Maintain the 3-hour block average catalytic oxidizer temperature above the minimum temperature established during the performance test; AND check the activity level of a representative sample of the catalyst at least every 12 months	Maintain the 3-hour block average THC concentration ^a in the catalytic oxidizer exhaust below the maximum concentration established during the performance test.

^aYou may choose to subtract methane from THC measurements.

Attachment 4: 40 CFR 63, Subpart DDDD, Tables 3 & 4

Table 3 to Subpart DDDD of Part 63—Work Practice Requirements

For the following process units at existing or new affected sources . . .	You must . . .
(3) Softwood veneer dryers	Minimize fugitive emissions from the dryer doors (through proper maintenance procedures) and the green end of the dryers (through proper balancing of the heated zone exhausts).
(5) Group 1 miscellaneous coating operations	Use non-HAP coatings as defined in §63.2292.

(1), (2), (4) not applicable to permittee

Table 4 to Subpart DDDD of Part 63—Requirements for Performance Tests

For . . .	You must . . .	Using . . .
(1) each process unit subject to a compliance option in table 1A or 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	select sampling port's location and the number of traverse ports	Method 1 or 1A of 40 CFR part 60, appendix A (as appropriate).
(2) each process unit subject to a compliance option in table 1A or 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	determine velocity and volumetric flow rate	Method 2 in addition to Method 2A, 2C, 2D, 2F, or 2G in appendix A to 40 CFR part 60 (as appropriate).
(3) each process unit subject to a compliance option in table 1A or 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	conduct gas molecular weight analysis	Method 3, 3A, or 3B in appendix A to 40 CFR part 60 (as appropriate).
(4) each process unit subject to a compliance option in table 1A or 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	measure moisture content of the stack gas	Method 4 in appendix A to 40 CFR part 60; OR Method 320 in appendix A to 40 CFR part 63; OR ASTM D6348–03 (IBR, see §63.14(b)).
(5) each process unit subject to a compliance option in table 1B to this subpart for which you choose to demonstrate compliance using a total HAP as THC compliance option	measure emissions of total HAP as THC	Method 25A in appendix A to 40 CFR part 60. You may measure emissions of methane using EPA Method 18 in appendix A to 40 CFR part 60 and subtract the methane emissions from the emissions of total HAP as THC.

Attachment 5: 40 CFR 63, Subpart DDDD, Table 5

Table 5 to Subpart DDDD of Part 63—Performance Testing and Initial Compliance Demonstrations for the Compliance Options and Operating Requirements

For each . . .	For the following compliance options and operating requirements . .	You have demonstrated initial compliance if
(2) Process unit listed in Table 1B to this subpart	Reduce emissions of total HAP, measured as THC, by 90 percent	Total HAP emissions, measured using the methods in Table 4 to this subpart over the 3-hour performance test, are reduced by at least 90 percent, as calculated using the procedures in §63.2262; AND you have a record of the operating requirement(s) listed in Table 2 to this subpart for the process unit over the performance test during which emissions were reduced by at least 90 percent.
(3) Process unit listed in Table 1B to this subpart	Limit emissions of total HAP, measured as THC, to 20 ppmvd	The average total HAP emissions, measured using the methods in Table 4 to this subpart over the 3-hour performance test, do not exceed 20 ppmvd; AND you have a record of the operating requirement(s) listed in Table 2 to this subpart for the process unit over the performance test during which emissions did not exceed 20 ppmvd.
(4) Process unit listed in Table 1B to this subpart	Reduce methanol or formaldehyde emissions by 90 percent	The methanol or formaldehyde emissions measured using the methods in Table 4 to this subpart over the 3-hour performance test, are reduced by at least 90 percent, as calculated using the procedures in §63.2262; AND you have a record of the operating requirement(s) listed in Table 2 to this subpart for the process unit over the performance test during which emissions were reduced by at least 90 percent.
(5) Process unit listed in Table 1B to this subpart	Limit methanol or formaldehyde emissions to less than or equal to 1 ppmvd (if uncontrolled emissions are greater than or equal to 10 ppmvd)	The average methanol or formaldehyde emissions, measured using the methods in Table 4 to this subpart over the 3-hour performance test, do not exceed 1 ppmvd; AND you have a record of the operating requirement(s) listed in Table 2 to this subpart for the process unit over the performance test during which emissions did not exceed 1 ppmvd. If the process unit is a reconstituted wood product press or a reconstituted wood product board cooler, your capture device either meets the EPA Method 204 criteria for a PTE or achieves a capture efficiency of greater than or equal to 95 percent.
(7) Process unit listed in Table 1B to this subpart controlled by routing exhaust to a combustion unit	Compliance options in Table 1B to this subpart or the emissions averaging compliance option in §63.2240(c)	You submit with your Notification of Compliance Status documentation showing that the process exhausts controlled enter into the flame zone of your combustion unit.

(1), (6) and (8) not applicable to permittee

Attachment 6: 40 CFR 63, Subpart DDDD, Table 6

Table 6 to Subpart DDDD of Part 63—Initial Compliance Demonstrations for Work Practice Requirements

For each . . .	For the following work practice requirements . .	You have demonstrated initial compliance if . . .
(3) Softwood veneer dryer	Minimize fugitive emissions from the dryer doors and the green end	You meet the work practice requirement AND you submit with the Notification of Compliance Status a copy of your plan for minimizing fugitive emissions from the veneer dryer heated zones (as required in §63.2265).
(5) Group 1 miscellaneous coating operations	Use non-HAP coatings as defined in §63.2292	You meet the work practice requirement AND you submit a signed statement with the Notification of Compliance Status that you are using non-HAP coatings AND you have a record showing that you are using non-HAP coatings.

(1), (2) & (4) not applicable to permittee

Attachment 7: 40 CFR 63, Subpart DDDD, Table 7

Table 7 to Subpart DDDD of Part 63—Continuous Compliance With the Compliance Options and

For . . .	For the following compliance options and operating requirements . . .	You must demonstrate continuous compliance by . . .
(1) Each process unit listed in Table 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	Compliance options in Table 1B to this subpart or the emissions averaging compliance option in §63.2240(c) and the operating requirements in Table 2 to this subpart based on monitoring of operating parameters	Collecting and recording the operating parameter monitoring system data listed in Table 2 to this subpart for the process unit according to §63.2269(a) through (b) and §63.2270; AND reducing the operating parameter monitoring system data to the specified averages in units of the applicable requirement according to calculations in §63.2270; AND maintaining the average operating parameter at or above the minimum, at or below the maximum, or within the range (whichever applies) established according to §63.2262.
(4) Each process unit using a catalytic oxidizer	Compliance options in Table 1B to this subpart or the emissions averaging compliance option in §63.2240(c)	Checking the activity level of a representative sample of the catalyst at least every 12 months and taking any necessary corrective action to ensure that the catalyst is performing within its design range.

(2), (3), (5) & (6) not applicable to permittee

Attachment 8: 40 CFR 63, Subpart DDDD, Tables 8 & 9

Table 8 to Subpart DDDD of Part 63—Continuous Compliance With the Work Practice Requirements

For	For the following work practice requirements	You must demonstrate continuous compliance by
(3) Softwood veneer dryer	Minimize fugitive emissions from the dryer doors and the green end	Following (and documenting that you are following) your plan for minimizing fugitive emissions.
(5) Group 1 miscellaneous coating operations	Use non-HAP coatings as defined in §63.2292	Continuing to use non-HAP coatings AND keeping records showing that you are using non-HAP coatings.

(1), (2) & (4) not applicable to the permittee

Table 9 to Subpart DDDD of Part 63 Requirements for Reports

You must submit a(n) . . .	The report must contain . . .	You must submit the report . . .
(1) Compliance report	The information in §63.2281(c) through (g)	Semiannually according to the requirements in §63.2281(b).
(2) immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your SSMP	(i) Actions taken for the event	By fax or telephone within 2 working days after starting actions inconsistent with the plan.
	(ii) The information in §63.10(d)(5)(ii)	By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority.

Attachment 9: 40 CFR 63, Subpart DDDD, Table 10

Table 10 to Subpart DDDD of Part 63—Applicability of General Provisions to Subpart DDDD			
Citation	Subject	Brief description	Applies to subpart DDDD
§63.1	Applicability	Initial applicability determination; applicability after standard established; permit requirements; extensions, notifications	Yes.
§63.2	Definitions	Definitions for part 63 standards	Yes.
§63.3	Units and Abbreviations	Units and abbreviations for part 63 standards	Yes.
§63.4	Prohibited Activities	Prohibited activities; compliance date; circumvention, fragmentation	Yes.
§63.5	Construction/Reconstruction	Applicability; applications; approvals	Yes.
§63.6(a)	Applicability	GP apply unless compliance extension; GP apply to area sources that become major	Yes.
§63.6(b)(1)–(4)	Compliance Dates for New and Reconstructed Sources	Standards apply at effective date; 3 years after effective date; upon startup; 10 years after construction or reconstruction commences for section 112(f)	Yes.
§63.6(b)(5)	Notification	Must notify if commenced construction or reconstruction after proposal	Yes.
§63.6(b)(6)	[Reserved]		
§63.6(b)(7)	Compliance Dates for New and Reconstructed Area Sources that Become Major	Area sources that become major must comply with major source standards immediately upon becoming major, regardless of whether required to comply when they were an area source	Yes.
§63.6(c)(1)–(2)	Compliance Dates for Existing Sources	Comply according to date in subpart, which must be no later than 3 years after effective date; for section 112(f) standards, comply within 90 days of effective date unless compliance extension	Yes.
§63.6(c)(3)–(4)	[Reserved]		
§63.6(c)(5)	Compliance Dates for Existing Area Sources that Become Major	Area sources that become major must comply with major source standards by date indicated in subpart or by equivalent time period (e.g., 3 years)	Yes.
§63.6(d)	[Reserved]		
§63.6(e)(1)–(2)	Operation & Maintenance	Operate to minimize emissions at all times; correct malfunctions as soon as practicable; operation and maintenance requirements independently enforceable; information Administrator will use to determine if operation and maintenance requirements were met	Yes.
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan (SSMP)	Requirement for SSM and SSMP; content of SSMP	Yes.
§63.6(f)(1)	Compliance Except During SSM	You must comply with emission standards at all times except during SSM	Yes.

*Note: §63.6(f)(1) was vacated by the Washington DC circuit Court of Appeals on December 19, 2008. The petitioners requested a rehearing on May 29, 2009.

Attachment 9: 40 CFR 63, Subpart DDDD, Table 10, continued

§63.6(f)(2)–(3)	Methods for Determining Compliance	Compliance based on performance test, operation and maintenance plans, records, inspection	Yes.
§63.6(g)(1)–(3)	Alternative Standard	Procedures for getting an alternative standard	Yes.
§63.6(h)(1)–(9)	Opacity/Visible Emission (VE) Standards	Requirements for opacity and visible emission standards	NA.
§63.6(i)(1)–(14)	Compliance Extension	Procedures and criteria for Administrator to grant compliance extension	Yes.
§63.6(i)(15)	[Reserved]		
§63.6(i)(16)	Compliance Extension	Compliance extension and Administrator's authority	Yes.
§63.6(j)	Presidential Compliance Exemption	President may exempt source category from requirement to comply with rule	Yes.
§63.7(a)(1)–(2)	Performance Test Dates	Dates for conducting initial performance testing and other compliance demonstrations; must conduct 180 days after first subject to rule	Yes.
§63.7(a)(3)	Section 114 Authority	Administrator may require a performance test under CAA section 114 at any time	Yes.
§63.7(b)(1)	Notification of Performance Test	Must notify Administrator 60 days before the test	Yes.
§63.7(b)(2)	Notification of Rescheduling	If have to reschedule performance test, must notify Administrator as soon as practicable	Yes.
§63.7(c)	Quality Assurance/Test Plan	Requirement to submit site-specific test plan 60 days before the test or on date Administrator agrees with; test plan approval procedures; performance audit requirements; internal and external QA procedures for testing	Yes.
§63.7(d)	Testing Facilities	Requirements for testing facilities	Yes.
§63.7(e)(1)	Conditions for Conducting Performance Tests	Performance tests must be conducted under representative conditions; cannot conduct performance tests during SSM; not a violation to exceed standard during SSM	Yes.
§63.7(e)(2)	Conditions for Conducting Performance Tests	Must conduct according to rule and EPA test methods unless Administrator approves alternative	Yes.
§63.7(e)(3)	Test Run Duration	Must have three test runs for at least the time specified in the relevant standard; compliance is based on arithmetic mean of three runs; specifies conditions when data from an additional test run can be used	Yes.
§63.7(f)	Alternative Test Method	Procedures by which Administrator can grant approval to use an alternative test method	Yes.
§63.7(g)	Performance Test Data Analysis	Must include raw data in performance test report; must submit performance test data 60 days after end of test with the notification of compliance status; keep data for 5 years	Yes.

Attachment 9: 40 CFR 63, Subpart DDDD, Table 10, continued

§63.7(h)	Waiver of Tests	Procedures for Administrator to waive performance test	Yes.
§63.8(a)(1)	Applicability of Monitoring Requirements	Subject to all monitoring requirements in standard	Yes.
§63.8(a)(2)	Performance Specifications	Performance specifications in appendix B of part 60 apply	Yes.
§63.8(a)(3)	[Reserved]		
§63.8(a)(4)	Monitoring with Flares	Requirements for flares in §63.11 apply	NA.
§63.8(b)(1)	Monitoring	Must conduct monitoring according to standard unless Administrator approves alternative	Yes.
§63.8(b)(2)–(3)	Multiple Effluents and Multiple Monitoring Systems	Specific requirements for installing monitoring systems; must install on each effluent before it is combined and before it is released to the atmosphere unless Administrator approves otherwise; if more than one monitoring system on an emission point, must report all monitoring system results, unless one monitoring system is a backup	Yes.
§63.8(c)(1)	Monitoring System Operation and Maintenance	Maintain monitoring system in a manner consistent with and good air pollution control practices	Yes.
§63.8(c)(1)(i)	Operation and Maintenance of CMS	Must maintain and operate CMS in accordance with §63.6(e)(1)	Yes.
§63.8(c)(1)(ii)	Spare Parts for CMS	Must maintain spare parts for routine CMS repairs	Yes.
§63.8(c)(1)(iii)	SSMP for CMS	Must develop and implement SSMP for CMS	Yes.
§63.8(c)(2)–(3)	Monitoring System Installation	Must install to get representative emission of parameter measurements; must verify operational status before or at performance test	Yes.
§63.8(c)(4)	Continuous Monitoring System (CMS) Requirements	CMS must be operating except during breakdown, out-of-control, repair, maintenance, and high-level calibration drifts; COMS must have a minimum of one cycle of sampling and analysis for each successive 10-second period and one cycle of data recording for each successive 6-minute period; CEMS must have a minimum of one cycle of operation for each successive 15 minute period	Yes.
§63.8(c)(5)	Continuous Opacity Monitoring System (COMS) Minimum Procedures	COMS minimum procedures	NA.
§63.8(c)(6)–(8)	CMS Requirements	Zero and high-level calibration check requirements; out-of-control periods	Yes.

Attachment 9: 40 CFR 63, Subpart DDDD, Table 10, continued

§63.8(d)	CMS Quality Control	Requirements for CMS quality control, including calibration, etc.; must keep quality control plan on record for 5 years. Keep old versions for 5 years after revisions	Yes.
§63.8(e)	CMS Performance Evaluation	Notification, performance evaluation test plan, reports	Yes.
§63.8(f)(1)–(5)	Alternative Monitoring Method	Procedures for Administrator to approve alternative monitoring	Yes.
§63.8(f)(6)	Alternative to Relative Accuracy Test	Procedures for Administrator to approve alternative relative accuracy tests for CEMS	Yes.
§63.8(g)	Data Reduction	COMS 6-minute averages calculated over at least 36 evenly spaced data points; CEMS 1 hour averages computed over at least 4 equally spaced data points; data that can't be used in average; rounding of data	Yes.
§63.9(a)	Notification Requirements	Applicability and State delegation	Yes.
§63.9(b)(1)–(2)	Initial Notifications	Submit notification 120 days after effective date; contents of notification	Yes.
§63.9(b)(3)	[Reserved]		
§63.9(b)(4)–(5)	Initial Notifications	Submit notification 120 days after effective date; notification of intent to construct/reconstruct; notification of commencement of construct/reconstruct; notification of startup; contents of each	Yes.
§63.9(c)	Request for Compliance Extension	Can request if cannot comply by date or if installed best available control technology/lowest achievable emission rate	Yes.
§63.9(d)	Notification of Special Compliance Requirements for New Source	For sources that commence construction between proposal and promulgation and want to comply 3 years after effective date	Yes.
§63.9(e)	Notification of Performance Test	Notify EPA Administrator 60 days prior	Yes.
§63.9(f)	Notification of Visible Emissions/Opacity Test	Notify EPA Administrator 30 days prior	No.
§63.9(g)	Additional Notifications When Using CMS	Notification of performance evaluation; notification using COMS data; notification that exceeded criterion for relative accuracy	Yes.
§63.9(h)(1)–(6)	Notification of Compliance Status	Contents; due 60 days after end of performance test or other compliance demonstration, except for opacity/VE, which are due 30 days after; when to submit to Federal vs. State authority	Yes.
§63.9(i)	Adjustment of Submittal Deadlines	Procedures for Administrator to approve change in when notifications must be submitted	Yes.

Attachment 9: 40 CFR 63, Subpart DDDD, Table 10, continued

§63.9(j)	Change in Previous Information	Must submit within 15 days after the change	Yes.
§63.10(a)	Recordkeeping/Reporting	Applies to all, unless compliance extension; when to submit to Federal vs. State authority; procedures for owners of more than one source	Yes.
§63.10(b)(1)	Recordkeeping/Reporting	General Requirements; keep all records readily available; keep for 5 years	Yes.
§63.10(b)(2)(i)–(iv)	Records Related to Startup, Shutdown, and Malfunction	Occurrence of each of operation (process equipment); occurrence of each malfunction of air pollution equipment; maintenance on air pollution control equipment; actions during startup, shutdown, and malfunction	Yes.
§63.10(b)(2)(vi) and (x)–(xi)	CMS Records	Malfunctions, inoperative, out-of-control	Yes.
§63.10(b)(2)(vii)–(ix)	Records	Measurements to demonstrate compliance with compliance options and operating requirements; performance test, performance evaluation, and visible emission observation results; measurements to determine conditions of performance tests and performance evaluations	Yes.
§63.10(b)(2)(xii)	Records	Records when under waiver	Yes.
§63.10(b)(2)(xiii)	Records	Records when using alternative to relative accuracy test	Yes.
§63.10(b)(2)(xiv)	Records	All documentation supporting initial notification and notification of compliance status	Yes.
§63.10(b)(3)	Records	Applicability determinations	Yes.
§63.10(c)(1)–(6), (9)–(15)	Records	Additional records for CMS	Yes.
§63.10(c)(7)–(8)	Records	Records of excess emissions and parameter monitoring exceedances for CMS	No.
§63.10(d)(1)	General Reporting Requirements	Requirement to report	Yes.
§63.10(d)(2)	Report of Performance Test Results	When to submit to Federal or State authority	Yes.
§63.10(d)(3)	Reporting Opacity or VE Observations	What to report and when	NA.
§63.10(d)(4)	Progress Reports	Must submit progress reports on schedule if under compliance extension	Yes.
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	Contents and submission	Yes.

Attachment 9: 40 CFR 63, Subpart DDDD, Table 10, continued

§63.10(e)(1)–(2)	Additional CMS Reports	Must report results for each CEM on a unit; written copy of performance evaluation; 3 copies of COMS performance evaluation	Yes.
§63.10(e)(3)	Reports	Excess emission reports	No.
§63.10(e)(4)	Reporting COMS data	Must submit COMS data with performance test data	NA.
§63.10(f)	Waiver for Recordkeeping/Reporting	Procedures for EPA Administrator to waive	Yes.
§63.11	Flares	Requirements for flares	NA.
§63.12	Delegation	State authority to enforce standards	Yes.
§63.13	Addresses	Addresses where reports, notifications, and requests are sent	Yes.
§63.14	Incorporation by Reference	Test methods incorporated by reference	Yes.
§63.15	Availability of Information	Public and confidential information	Yes

Attachment 10: MRRR 2M VE flowchart

